

PREA Facility Audit Report: Final

Name of Facility: Barbara Ester Unit

Facility Type: Prison / Jail

Date Interim Report Submitted: 03/20/2025

Date Final Report Submitted: 10/15/2025

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: DeShane Reed	Date of Signature: 10/15/2025

AUDITOR INFORMATION	
Auditor name:	Reed, DeShane
Email:	dreed@drbconsultinggroup.com
Start Date of On-Site Audit:	12/16/2024
End Date of On-Site Audit:	12/18/2024

FACILITY INFORMATION	
Facility name:	Barbara Ester Unit
Facility physical address:	7500 Corrections Circle, Pine Bluff, Arkansas - 71603
Facility mailing address:	

Primary Contact

Name:	Steven Ricketts
Email Address:	Steven.Ricketts@doc.arkansas.gov
Telephone Number:	870-297-3302

Warden/Jail Administrator/Sheriff/Director	
Name:	Deangelo Earl
Email Address:	deangelo.earl@doc.arkansas.gov
Telephone Number:	501-897-2845

Facility PREA Compliance Manager	
Name:	Steven Ricketts
Email Address:	Steven.Ricketts@doc.arkansas.gov
Telephone Number:	870-297-3302

Facility Health Service Administrator On-site	
Name:	Patti Vanlandingham
Email Address:	PAVanlandingham@Wellpath.us
Telephone Number:	870-730-0403

Facility Characteristics	
Designed facility capacity:	579
Current population of facility:	705
Average daily population for the past 12 months:	699
Has the facility been over capacity at any point in the past 12 months?	Yes
What is the facility's population designation?	Mens/boys

In the past 12 months, which population(s) has the facility held? Select all that apply (Nonbinary describes a person who does not identify exclusively as a boy/man or a girl/woman. Some people also use this term to describe their gender expression. For definitions of “intersex” and “transgender,” please see https://www.prearesourcecenter.org/standard/115-5)	
Age range of population:	19-83
Facility security levels/inmate custody levels:	Minimum, Medium
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	116
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	29
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	33

AGENCY INFORMATION

Name of agency:	Arkansas Department of Corrections
Governing authority or parent agency (if applicable):	
Physical Address:	1302 Pike Avenue, Suite C, North Little Rock, Arkansas - 72114
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:

Name:	Lindsay Wallace
Email Address:	Lindsay.Wallace@doc.arkansas.gov
Telephone Number:	501-682-3309

Agency-Wide PREA Coordinator Information			
Name:	Haley Reeves	Email Address:	Haley.Reeves@doc.arkansas.gov

Facility AUDIT FINDINGS	
Summary of Audit Findings	
<p>The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.</p> <p>Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.</p>	
Number of standards exceeded:	
0	
Number of standards met:	
45	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION

Please note: Question numbers may not appear sequentially as some questions are omitted from the report and used solely for internal reporting purposes.

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2024-12-16
2. End date of the onsite portion of the audit:	2024-12-18

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
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AUDITED FACILITY INFORMATION

14. Designated facility capacity:	579
15. Average daily population for the past 12 months:	690
16. Number of inmate/resident/detainee housing units:	12
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit

Inmates/Residents/Detainees Population Characteristics on Day One of the Onsite Portion of the Audit

23. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	698
25. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	79
26. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	135
27. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	2
28. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	2
29. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	6
30. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	216

<p>31. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</p>	<p>2</p>
<p>32. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</p>	<p>10</p>
<p>33. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</p>	<p>11</p>
<p>34. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>35. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</p>	<p>No text provided.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>36. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</p>	<p>152</p>
<p>37. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>31</p>

38. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	29
39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	32
41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input checked="" type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input checked="" type="checkbox"/> Gender <input checked="" type="checkbox"/> Other <input type="checkbox"/> None
If "Other," describe:	This auditor attempted to identify and interview BEU inmates who fit the target group per the PREA Auditor's Handbook.

<p>42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>This auditor requested to view the Master Population Roster, which contains inmate demographic and ethnic information. This auditor also conversed and reviewed medical documentation to identify targeted groups and establish a diverse sample of random inmate interviews.</p>
<p>43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>44. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>No text provided.</p>
<p>Targeted Inmate/Resident/Detainee Interviews</p>	
<p>45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>19</p>
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<p>47. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>5</p>

48. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	1
49. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	1
50. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	1
51. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	2
52. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	3
53. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	2

<p>54. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>1</p>
<p>55. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>2</p>
<p>56. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>1</p>
<p>57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>No text provided.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>58. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>27</p>

<p>59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input type="checkbox"/> Length of tenure in the facility</p> <p><input type="checkbox"/> Shift assignment</p> <p><input type="checkbox"/> Work assignment</p> <p><input type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>If "Other," describe:</p>	<p>I also interviewed based on the required specialized staff criteria per the PREA Auditor's Handbook. These 27 interviewed staff include specialized staff and contracted medical professional staff, and volunteers.</p>
<p>60. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>No text provided.</p>
<p>Specialized Staff, Volunteers, and Contractor Interviews</p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p>62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>10</p>
<p>63. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No
65. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
66. Were you able to interview the PREA Compliance Manager?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

67. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)

- Agency contract administrator
- Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment
- Line staff who supervise youthful inmates (if applicable)
- Education and program staff who work with youthful inmates (if applicable)
- Medical staff
- Mental health staff
- Non-medical staff involved in cross-gender strip or visual searches
- Administrative (human resources) staff
- Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff
- Investigative staff responsible for conducting administrative investigations
- Investigative staff responsible for conducting criminal investigations
- Staff who perform screening for risk of victimization and abusiveness
- Staff who supervise inmates in segregated housing/residents in isolation
- Staff on the sexual abuse incident review team
- Designated staff member charged with monitoring retaliation
- First responders, both security and non-security staff
- Intake staff

	<input checked="" type="checkbox"/> Other
If "Other," provide additional specialized staff roles interviewed:	I also interviewed based on the required specialized staff criteria per the PREA Auditor's Handbook.
68. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of VOLUNTEERS who were interviewed:	3
b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input checked="" type="checkbox"/> Religious <input type="checkbox"/> Other
69. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of CONTRACTORS who were interviewed:	4
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input checked="" type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input checked="" type="checkbox"/> Other

70. Provide any additional comments regarding selecting or interviewing specialized staff.	I interviewed Mental Health Practitioners, as well
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SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.

71. Did you have access to all areas of the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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Was the site review an active, inquiring process that included the following:

72. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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73. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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74. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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<p>75. Informal conversations with staff during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>76. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p>	<p>No text provided.</p>
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Documentation Sampling

Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.

<p>77. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>While onsite, I requested my own samples of documents, reviewed files while onsite, and other verification to determine compliance. This auditor also tested the PREA Internal Hotline to ensure confidential reporting. This auditor also contacted CLEST (Commission on Law Enforcement Standards and Training) to verify them as external confidential reporting resource for BEU inmates.</p>
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SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

Remember the number of allegations should be based on a review of all sources of allegations (e.g., hotline, third-party, grievances) and should not be based solely on the number of investigations conducted. Note: For question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, or detainee sexual abuse allegations and investigations, as applicable to the facility type being audited.

79. Total number of SEXUAL ABUSE allegations and investigations overview during the 12 months preceding the audit, by incident type:

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	1	0	1	0
Staff-on-inmate sexual abuse	0	0	0	0
Total	1	0	1	0

80. Total number of SEXUAL HARASSMENT allegations and investigations overview during the 12 months preceding the audit, by incident type:

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	2	0	2	0
Staff-on-inmate sexual harassment	2	0	2	0
Total	4	0	4	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

Note: these counts should reflect where the investigation is currently (i.e., if a criminal investigation was referred for prosecution and resulted in a conviction, that investigation outcome should only appear in the count for “convicted.”) Do not double count. Additionally, for question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, and detainee sexual abuse investigation files, as applicable to the facility type being audited.

81. Criminal SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
Inmate-on-inmate sexual abuse	0	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0	0
Total	0	0	0	0	0

82. Administrative SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0
Total	0	0	0	0

Sexual Harassment Investigation Outcomes

Note: these counts should reflect where the investigation is currently. Do not double count. Additionally, for question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, and detainee sexual harassment investigation files, as applicable to the facility type being audited.

83. Criminal SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
Inmate-on-inmate sexual harassment	0	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0	0
Total	0	0	0	0	0

84. Administrative SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	2	0	0
Staff-on-inmate sexual harassment	0	2	0	0
Total	0	4	0	0

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

85. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:

3

<p>86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p>Inmate-on-inmate sexual abuse investigation files</p>	
<p>87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>2</p>
<p>88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>Staff-on-inmate sexual abuse investigation files</p>	
<p>90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>1</p>
<p>91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>2</p>
<p>94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p>Inmate-on-inmate sexual harassment investigation files</p>	
<p>95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

Staff-on-inmate sexual harassment investigation files	
98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	2
99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
100. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
101. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	No text provided.
SUPPORT STAFF INFORMATION	
DOJ-certified PREA Auditors Support Staff	
102. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	<input type="radio"/> Yes <input checked="" type="radio"/> No

Non-certified Support Staff

103. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.

Yes

No

a. Enter the TOTAL NUMBER OF NON-CERTIFIED SUPPORT who provided assistance at any point during this audit:

1

AUDITING ARRANGEMENTS AND COMPENSATION

108. Who paid you to conduct this audit?

The audited facility or its parent agency

My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)

A third-party auditing entity (e.g., accreditation body, consulting firm)

Other

Standards	
Auditor Overall Determination Definitions	
<ul style="list-style-type: none"> • Exceeds Standard (Substantially exceeds requirement of standard) • Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period) • Does Not Meet Standard (requires corrective actions) 	
Auditor Discussion Instructions	
<p>Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.</p>	

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.11. Barbara Ester Unit follows the Arkansas Department of Corrections policies and submitted the “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.11. An excerpt states, <i>“As the executive head of the Arkansas Department of Corrections (DOC), it is the responsibility of the Secretary of Corrections (Secretary) to administer the various rules, orders, or directives issued by the DOC. The purpose of this directive is to ensure that the DOC remains in compliance with the Prison Rape Elimination Act (PREA). The DOC has a “zero-tolerance” approach toward all forms of sexual abuse and sexual harassment. This directive also sets forth the DOC’s zero-tolerance approach to preventing, detecting, and responding to such conduct. The DOC will initially respond to all reports of sexualized behavior or abuse as nonconsensual,</i></p>

regardless of perception, rumor, appearance, or participant disclosure.” Additionally, “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” states, “PREA Coordinator: Individual responsible for developing PREA training as needed, writing, revising, and updating policies and procedures involving PREA standards; annually reviewing policies for effectiveness and possible standard deficiencies; and advising staff regarding implementation and interpretation of PREA policies.”

This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and has concluded that it has the necessary language to align with PREA Standard 115.11.

Barbara Ester Unit (BEU) submitted their Organizational Chart which identified the PREA Coordinator who oversees all ARDOC’s efforts to comply with PREA Standards in all their facilities. Additionally, this PREA auditor interviewed ARDOC’s Secretary of Corrections, who shared ARDOC’s commitment to PREA’s efforts to prevent, detect and respond to sexual abuse and sexual harassment within all ARDOC facilities. Additionally, this PREA Auditor interviewed ARDOC’s PREA Coordinator (PC). She shared the same commitment to PREA’s efforts, as well as stated that she was supported by ARDOC Secretary of Corrections and ARDOC’s Chief of Legal Council (PC’s direct report under the Secretary of Corrections). During this auditor’s interview with ARDOC’s PC, she shared the multiplicity of additional responsibilities which compete for her time as ARDOC’s PC. She shared that she is responsible for coordinating and monitoring PREA efforts throughout all 28 facilities statewide, conducting PREA Training for all new hired facility employees, tracking PREA incidents/allegations/investigations, and writing annual reports. This auditor recommended that ARDOC’s Secretary of Corrections develop an Agency-level PREA Compliance Unit (PCU), or team, which consists of a minimum of two assigned ARDOC staff to be added to ARDOC PREA Coordinator’s team.

On October 1, 2024, ARDOC posted a new position, on 10/01/2024, to hire an Assistant PREA Coordinator/Administrative Analyst position. The goal is to develop ARDOC’s agency level PREA compliance team, to oversee PREA efforts throughout ARDOC facilities. ARDOC submitted their job posting, which included job duties, as evidence of compliance. On 11/25/24, ARDOC hired their Assistant PREA Coordinator/Administrative Analyst. This auditor formerly met the new team member in-person.

Finally, ARDOC submitted the “welcome email” sent to all ARDOC facilities PREA Compliance Manager, informing them of their Assistant PREA Coordinator/Administrative Analyst’s new hire. See the redacted email below:

*From: -----, PREA Coordinator (DOC)
Sent: Tuesday, November 26, 2024 9:32 AM
To: ADC PREA Compliance Managers
Subject: PREA Assistant - Welcome
Importance: High*

Good morning everyone,

Please welcome Ms. ----- ----- to the PREA team! She will be working as my assistant on various projects as well as helping you all with compliance. Please forward your monthly reports to her starting with the December 2nd report. Beginning December

9, she will be responsible for ensuring your retaliation assessments and Sexual Abuse Incident Reviews (SAIRs) are being completed in a timely manner. Furthermore, she will be my backup to any trainings I instruct. As always, feel free to reach out to me if you need anything.

Thank you,

PREA Coordinator, M.A., PhD-C

Agency PREA Coordinator

Arkansas Department of Corrections (ARDOC)

The addition of this team member will allow for enough time for ARDOC's PREA Coordinator to effectively engage in her primary role.

This PREA auditor concludes that the Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.11.

115.12	Contracting with other entities for the confinement of inmates
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	Auditor Overall Determination: Meets Standard
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	Auditor Discussion
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	<p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center's Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.12. The Arkansas Department of Corrections submitted 53 of their contracts for confinement. Three contracts were with "Re-Entry Facilities" and 50 were with contracted jails through their "309" Contracts. ARDOC's "309" Contracts are agreements between ARDOC and participating county jails within the state, to provide confinement (bed space) at local county jails for specifically screened/charged ARDOC inmates.</p>
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	<p>This auditor reviewed the 50 "309" Jail Contracts" submitted by ARDOC's PC during their previous PREA Agency Audit. This auditor also reviewed 3 "Re-Entry Facilities" contracts during this onsite audit. The 3 contracts ARDOC has with the "Re-Entry Facilities" had language in their contracts which aligns with this PREA Standard. However, when this auditor reviewed the language in ARDOC's 50 "309 Contracts," they did not contain the language required for the contracted entities to be compliant with ALL PREA Standards. USDOJ PREA Standard 115.12 states, "(a) A public agency that contracts for the confinement of its inmates with private agencies or other entities, including other government agencies, shall include in any new contract or contract renewal the entity's obligation to adopt and comply with the PREA standards. (b) Any new contract or contract renewal shall provide for agency contract</p>
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monitoring to ensure that the contractor is complying with the PREA standards.”

Excerpts from ARDOC’s “309 Contracts” language stated, *“The contractor (county) must be in compliance or have asserted the agency is working towards full compliance, with 28 CFR Part 115 (PREA)...(c) by no later than 60 calendar days after the state agencies authorization to proceed, the contractor shall develop a standard operating procedure (SOP) regarding PREA. At a minimum, the SOP shall address the following:*

i. Emergency response to an incident of sexual abuse or assault

ii. Standard response protocols to reported incidents of sexual harassment

iii. Prohibition of all cross-gender strip searches and body cavity searches and a prohibition of all cross-gender pat down searches of female inmates by the county.”

While onsite, this auditor interviewed ARDOC’s 309 Coordinator, who serves as the liaison between ARDOC and the participating “309” county jails. He shared that he cannot recall any of the 50 participating “309” county jails making efforts to be “fully compliant” with the PREA Standards. He further shared that each jail has PREA-related protocols and procedures, however, they do not comply with all PREA Standards. He stated, *“Becoming fully PREA compliant has not been on their radar.”* This auditor confirmed this while interviewing ARDOC’s Agency Head, Chief of Staff, and PREA Coordinator. They also confirmed that the participating “309” jails are not PREA compliant nor making efforts to be PREA compliant jails. This auditor can confirm that 1 participating “309” county jail is compliant with PREA standards, as this auditor conducted the audit of the facility. Furthermore, currently ARDOC does not have any personnel who monitor the participating “309” county jails, to ensure that the jails are complying with the PREA standards. As a result, many of ARDOC’s reoccurring “309” contracts with county jails have been in place for many years and have not had PREA monitoring oversight or a PREA Facility Audit.

This auditor recommended ARDOC revise their “309” contract language to clearly align with PREA Standard 115.12, ensuring that each contracted for confinement “309” county jail adopt and comply with PREA Standards, receiving PREA facility audits every 3 years. Additionally, this auditor recommended ARDOC assign personnel who are knowledgeable in PREA, to provide monitoring to all its participating “309” county jails, with the goal of ensuring full PREA compliance through receiving a PREA Audit.

After this auditor’s recommendation, ARDOC engaged in multiple meetings with ARDOC’s agency leadership, as well as multiple communications with the 50 currently participating “309” county jails. These meeting entailed ARDOC making the current 50 participating “309” county jail leaders aware of ARDOC’s non-compliance with PREA Standard 115.12, informing the actions ARDOC needed to take to move into compliance, and adjustments ARDOC will be making to their “309” county jail contracts to move into compliance. Furthermore, ARDOC amended all their current “309” county jail contracts, provided a window of opportunity for the various 50

	<p>participating count jails leaders to review, respond, sign, or opt out of ARDOC’s amended contract (which contained new contractual language/requirements to align with the PREA Standard 115.12). ARDOC’s amended contractual language states, <i>“The COUNTY shall adhere to the standards as stated in the Prison Rape Elimination Act of 2003. The DIVISION shall conduct an informal audit prior to August 19, 2025. The COUNTY shall allow access to facilities and records to the DIVISION as needed to perform the informal audit. The COUNTY shall provide to the DIVISION a certification of full compliance with the PREA prior to August 19, 2026.”</i></p> <p>On 1/15/25, ARDOC’s PREA Coordinator submitted 49 executed/signed amended contracts (uploaded in OAS) from 49 participating “309” county jails. ARDOC’s PREA Coordinator shared that, going forward, additional county jails interested in becoming a contracted “309” county jail, will have to adhere to the amended contract provisions (which includes the amended PREA language).</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.12.</p>
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115.13	Supervision and monitoring
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.13. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.13. Excerpts states, <i>“Each facility shall develop, document, and make its best efforts to comply on a regular basis with a Staffing plan that provides for adequate levels of Staffing and, where applicable, video monitoring, to protect Offenders from Sexual Abuse.</i></p> <p><i>1. In calculating adequate Staffing levels and determining the need for video monitoring, Prisons shall take into consideration:</i></p> <ul style="list-style-type: none"> <i>a. Generally accepted detention and correctional practices;</i> <i>b. Any judicial findings of inadequacy;</i> <i>c. Any findings of inadequacy from federal investigative agencies;</i> <i>d. Any findings of inadequacy from internal or external oversight bodies;</i> <i>e. All components of the facility’s physical plant, including blind spots or area</i>

where Staff or Offenders may be isolated;

f. The composition of the Offender population;

g. The number and placement of supervisory Staff;

h. Institution programs occurring on a particular shift;

i. Any applicable state or local laws, regulations, or standards;

j. The prevalence of Substantiated and Unsubstantiated incidents of Sexual Abuse; and

k. Any other relevant factors.”

This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and concluded that it has the necessary language to align with PREA Standard 115.13.

While onsite, this auditor interviewed BEU’s Deputy Warden/PREA Compliance Manager, who shared that BEU complies with the protocol identified in their staffing plan. He shared that when call-offs and time-offs occur, BEU provides coverage through adjusting/rotating on-shift staffing as well as offering voluntary overtime. This allows BEU’s staffing plan and staffing coverage to remain fulfilled without deviations.

If a deviation occurs, the Chief of Security on duty documents it in the "eOMIS" (Electronic Offender Management Information System) which can be viewed by BEU’s leadership team, PCM and ARDOC’s PC. All deviations are reported to the ARDOC’s PC for tracking and annual review.

This auditor also reviewed BEU’s “Staffing Plan” (October 2024) which documented BEU’s process of ensuring adequate staffing to protect inmates from sexual abuse. BEU’s “Staffing Plan” contains all the components which need consideration when identifying staffing needs. This auditor verified that there were no deviations from the staffing plan within the last 12 months. They explained that when there is a deviation from the staffing plan, and after all other above-mentioned alternatives have been exhausted, leadership will be contacted. This PREA auditor also reviewed the facility’s staffing roster for the past 6 months, which seemed to have adequate staffing coverage to protect inmates from sexual abuse. This auditor observed that there were no special inmate population specifications within the Staffing Plan.

This auditor chose a random selection of unannounced supervisory rounds from 2/2024 to 11/2024. This auditor observed that unannounced supervisory rounds were completed and were noted in BEU’s green logbooks in red ink.

This auditor recommended the addition of cameras in specific areas, to improve supplemental video monitoring to enhance their ability to protect inmates from sexual abuse. Those specific areas were as follows:

1. Laundry Area:

a. 1 Camera needed in back corner in place of fan nearest the machines

2. Issuance Area:

- a. 1 camera near fan on other side to catch activity in between racks.

3. Barracks:

- a. Digital Blot for all cameras facing shower and toilet areas in the following places:

- i. Barrack 6 (E POD, B POD, Restrictive Housing 8 cells)

- ii. Barracks 7, 8, 9, 10, 11, 12

4. Commissary Area:

- a. 1 "360" fisheye camera

This PREA auditor concluded that Barbara Ester Unit (BEU) was not in compliance with PREA Standard 115.13. Corrective Action was required.

During Barbara Ester Unit (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and correspondence with ARDOC's PREA Coordinator (PC) and BEU's Deputy Warden/PREA Compliance Manager (PCM). The goal was to discuss the recommended corrective actions needed to meet compliance with this standard. After the meetings and email correspondence, BEU's Deputy Warden/PREA Compliance Manager submitted photo evidence of video blotting of showering areas and toilets in Barrack 6 (E POD, B POD, Restrictive Housing 8 cells), as well as Barracks 7, 8, 9, 10, 11, 12. Additionally, ARDOC's PREA Coordinator submitted a quote from a commercial company to provide camera's (dated 7/29/25), followed by a signed "Arkansas Department of Corrections Requisition" for additional cameras. This requisition was signed by BEU's Warden (7/30/25) and ARDOC's Agency Head/Secretary (9/4/25). ARDOC's PREA Coordinator also submitted a "Memo" from ARDOC's Agency Head/Secretary approving the purchasing process for the identified/recommended video monitoring. The "Memo" states,

To: Dr. (PREA Coordinator)

From: Secretary (Agency Head)

RE: Camera Enhancements for Barbara Ester Unit

Date: September 15, 2025

Thank you for your work in compiling the list of cameras recommended by our Prison Rape Elimination Act (PREA) auditor. Ensuring the safety of our units is a top priority for me, and I authorize our construction team to begin the purchasing process. I am reviewing the needs of the department to determine whether these cameras need to be installed or replaced as part of a standalone project or whether these changes are better adopted into a comprehensive camera project.

This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.13.

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.14. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.14. An excerpt states, <i>“A Youthful Offender shall not be placed in a housing unit in which the Youthful Offender will have sight, sound, or physical contact with any adult Offender through use of a shared dayroom, shower area, toilet area, or sleeping quarters. b. All Youthful Offenders will be housed at the designated unit in a housing area that provides for sight and sound separation from other Offenders over the age of seventeen (17). The Youthful Offenders will be able to attend all unit activities, receive all unit services, and participate in jobs and programs as deemed appropriate by the unit classification committee. Youthful Offenders must be directly supervised when not in their assigned housing area.”</i></p> <p>This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and concluded that it has the necessary language to align with PREA Standard 115.14.</p> <p>This PREA auditor reviewed multiple randomly selected dates of BEU facility rosters and counts while onsite. No youthful inmates were present on the rosters. ARDOC’s PREA Coordinator and BEU’s PREA Compliance Manager/Deputy Warden also shared that BEU did not house youthful inmates. The daily counts while this auditor was onsite did not show youthful inmates being housed at BEU. This auditor also interviewed a random selection of 27 specialized, contracted, and direct supervision staff, as well as volunteers. Each responded that youthful inmates are not housed at BEU. This auditor also interviewed a random selection of 32 inmates, selected from BEU’s daily inmate roster. All 32 interviewed inmates shared that BEU did not house youthful inmates. During this auditor’s exhaustive site review/tour, this auditor informally asked multiple inmates if there were inmates under 18 housed at BEU. Each response was similar, stating that there were no inmates under 18 years old at this facility.</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.14.</p>

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard

Auditor Discussion

This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center's Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.15. Barbara Ester Unit (BEU) submitted their "Arkansas Department of Corrections PREA Secretarial Directive (2024-02)" as evidence of compliance with PREA Standard 115.15. An excerpt states, "*(a) The facility shall document all cross-gender strip searches and cross-gender visual body cavity searches and shall document all cross-gender pat-down searches of female Offenders.*

(b) The facility shall not conduct cross-gender strip searches or cross-gender visual body cavity searches except in Exigent Circumstances or when performed by medical practitioners.

(c) For a facility whose rated capacity does not exceed 50 inmates, the facility shall not permit cross-gender pat-down searches of female Offenders, absent Exigent Circumstances. Facilities shall not restrict female Offenders' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision.

(d) Offenders shall be permitted to shower, perform bodily functions, and change clothing without Staff of the opposite gender viewing their breasts, buttocks, or genitalia except in Exigent Circumstances or when such viewing is incidental to routine cell checks.

(e) Staff of the opposite gender shall announce their presence when entering an Offender housing unit.

(f) Staff shall be prohibited from searching or physically examining a Transgender or Intersex Offender for the sole purpose of determining the Offender's genital status."

This auditor reviewed "ARDOC's Secretarial Directive (2024-02)" and concluded that it has the necessary language to align with PREA Standard 115.15.

While on-site, this PREA auditor interviewed 32 randomly selected inmates. Each inmate verified that pat searches are conducted by both male and female officers.

When this auditor interviewed a random selection of 10 BEU direct supervision staff and asked, "*Which gender staff pat searches a transgender or intersex?*" There were inconsistent responses from the 10 interviewed BEU direct supervision staff. None were aware of the appropriate procedures regarding transgender searches. Some staff stated that because a transgender or intersex inmate is placed in a male facility they would be searched by a male. All staff had knowledge of pat search procedures but were unaware of the procedures for searching transgender inmates. BEU is an all-male facility.

While onsite, this auditor conducted a site review/tour and observed that there was

no privacy in the toilet and shower areas. Some toilet areas were partially covered by half walls. The shower areas have a half wall however inmates can still be seen fully by female staff due to the openings within the halfway. Female staff can also see naked inmates showering from the elevated control booth where there is visual access into the shower and toilet areas. Inmates have little to no privacy while toileting and at times utilize trash bins and lids to create privacy when using the restroom.

Further, this auditor interviewed a random selection of 32 BEU inmates. There were 5 of the 32 randomly selected interviewed inmates who shared that they do feel that they have enough privacy to shower, use toilet, perform bodily functions, and get dressed without being viewed by non-medical staff of the opposite gender. Twenty-seven inmates shared that there is no privacy when using the toilet, showering, or dressing.

During this auditor's site review/tour, this auditor did not observe or hear about gender announcements occurring upon entry into each barrack. This auditor interviewed a random selection of 10 direct supervision staff and asked if female staff announce prior to entering inmate bathroom and sleeping quarters? Ten out of 10 staff members shared that announcing prior to entering the rooms and bathrooms of inmates is not occurring. It is a new practice that female staff have not become accustomed to doing. None of the inmates stated that female staff announce their presence when entering their barracks.

This auditor recommended that BEU provide PREA curtains for the following barrack locations to ensure that there is adequate privacy from the potential of opposite gender viewing when not conducting security rounds.

Showers in the following Barracks:

1. Barracks 1 A & B—PREA curtain at the shower opening
2. Barracks 1 C & D—7 PREA curtains of each toilet and shower area
3. Barracks 2 & 3—Need ½ PREA curtains in shower area on both sides of the barracks
4. Barracks 4 & 5—Full PREA curtains for both shower areas
5. Barracks 7 & 8—PREA Curtains
6. Barracks 9 & 10—need barrier in shower area
7. Barracks 11 & 12—PREA Curtains

This auditor also recommended "*digitally blotting/blocking*" all toilet/shower areas on the following cameras where opposite gender staff working that post can view naked bodies as ARDOC currently does not have restricted gender posts within this facility:

a. "*Digital Blot/Block*" for all cameras facing shower and toilet areas in the following places:

- i. Barrack 6 (E POD, B POD, Restrictive Housing 8 cells)
- ii. Barracks 7, 8, 9, 10, 11, 12

Furthermore, this auditor recommended BEU conduct staff *"Refresher Training"* on the importance of consistency in opposite gender announcing when monitoring all housing units. This auditor recommends BEU post visible signage at the entrance to inmate housing units/barracks (where showering, toileting, and changing clothing occurs) stating, *"Opposite Gender MUST ANNOUNCE When Entering,"* to remind opposite gender staff to make required announcement when entering. Each opposite gender announcement should also be consistently documented in the shift logbook as verification of compliance. This auditor recommended BEU establish consistency in practice of opposite gender announcing before compliance can be determined and concluded.

Finally, this recommended *"Refresher Training"* to all BEU staff on professional conduct with transgender/intersex inmates. Content should entail the following topics: defining LGBTI, professional interactions with transgender, pat/strip search procedures of transgender/intersex inmates, serious considerations of transgender/intersex inmate own perception of safety, allowing transgender/intersex inmates to shower opposite of the other BEU inmates. BEU's training curriculum and acknowledgement of staff attending these trainings should be documented and provided as evidence. This PREA auditor concluded that Barbara Ester Unit (BEU) was not in compliance with PREA Standard 115.15. Corrective Action was required.

During Barbara Ester Unit (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and correspondence with ARDOC's PREA Coordinator (PC) and BEU's Deputy Warden/PREA Compliance Manager (PCM). The goal was to discuss the recommended corrective actions needed to meet compliance with this standard. After the meetings and email correspondence, BEU's Deputy Warden/PREA Compliance Manager submitted photo evidence of video blotting of showering areas and toilets in Barrack 6 (E POD, B POD, Restrictive Housing 8 cells), as well as Barracks 7, 8, 9, 10, 11, 12. BEU's Deputy Warden/PREA Compliance Manager (PCM) also submitted photo evidence of shower curtains for barrack locations recommended by above by this auditor (Barracks #1 through #12), to ensure there is adequate privacy from potential opposite gender staff viewing when not conducting security rounds.

Additionally, BEU's Deputy Warden/PREA Compliance Manager (DW/PCM) shared with this auditor that *"Opposite Gender Viewing and Searching"* and *"Professionalism with LGBTI Offenders"* trainings has been added to their *"Pre-Service"* and *"Annual In-Service"* trainings. BEU's DW/PCM submitted attendance/sign in sheets to their *"PREA Annual Review"* training (dated 3/10/25, 3/11/25, 3/13/25, and 3/17/25). The combined dated sign-in sheets had 77 staff attendance signatures. This auditor also received the *"Professionalism with LGBTI Offenders"* PPT curriculum (16 slides), as well as the *"Arkansas Department of Corrections PREA Training for Staff"* refresher training PPT curriculum (34 slides).

Furthermore, BEU's Deputy Warden/PREA Compliance Manager submitted photo evidence of *"Posted Directives"* signage regarding *"Opposite Gender Announcing When Entering Inmate Housing Areas."* These *"Posted Directives"* signs were posted in high traffic areas, to remind opposite gender staff to make required

	<p>announcements when entering inmate housing units. BEU's DW/PCM also submitted BEU's updated "Post Orders" (Page 7; Note II) which states, "Any person that is of the opposite gender of the inmates housed in the housing area must clearly and loudly announce their presence prior to entering the housing area (i.e. Female/Male on the Floor, Female/Male on Deck). Officers holding a post in a housing area must both announce and log their presence in the housing area upon taking post, as well as continue to announce their presence prior to each physical entry into the housing area." Moreover, BEU submitted randomly selected "Security Logs" showing documentation of opposite gender staff announcing when entering housing barracks #4, #6, #8, and #12, for the following dates: July 1st, 7th, 13th, 20th, and 28th, 2025.</p> <p>Finally, BEU's DW/PCM submitted BEU's "Shift Briefings" discussion notes and attendance roster (from 9/9/25 through 9/15/25), as evidence of "Staff Refresher Training" on "Opposite Gender Announcing and Documentation When Entering Inmate Housing Areas." This training was discussed daily for 7 days during "Shift Briefings" to ensure that all staff shifts and schedules receive the information. If specific staff were absent on any one day, the information would still be available and discussed on their following return day during "Shift Briefings."</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.15.</p>
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115.16	Inmates with disabilities and inmates who are limited English proficient
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center's Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.16. Barbara Ester Unit (BEU) submitted their "Arkansas Department of Corrections PREA Secretarial Directive (2024-02)" as evidence of compliance with PREA Standard 115.16. An excerpt states, "Each facility shall provide Offender education in formats accessible to all Offenders, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, and for Offenders who have limited reading skills. Use of Offender interpreters for assistance in Offender education on aspects of the DOC's efforts to prevent, detect, and respond to Sexual Abuse and Sexual Harassment shall be prohibited except in circumstances where extended delay in obtaining an effective interpreter could compromise the Offender's safety."</p> <p>This auditor reviewed "ARDOC's Secretarial Directive (2024-02)" and concluded that it</p>

has the necessary language to align with PREA Standard 115.16.

While on site, this auditor interviewed ARDOC's PREA Coordinator. She shared that translation services are provided through ARDOC courts, who can provide interpreters via ZOOM. During interviews with 10 direct supervision and supervisory staff, they did not know about translation access through ARDOC courts. Direct supervision staff interviewed were unsure on how to provide translation/interpretation to non-English speaking inmates except through another inmates. No direct supervision staff had knowledge of a formal language service for interpretation.

Additionally, while on site, this auditor did observe PREA reporting postings throughout BEU in English and Spanish however the PREA pamphlet on the kiosk was in English only. This auditor also reviewed the PREA Pamphlets in English and Spanish, as well as viewed PREA Inmate Education videos in English, Spanish, and closed captioned for the hearing impaired. This auditor interviewed 2 Limited English Proficient (LEP) inmates during the onsite visit. During the interviews, neither recalled receiving a pamphlet in Spanish or viewing the PREA video in Spanish.

Furthermore, this auditor interviewed ARDOC's contracted medical services provider's (WellPath) Health Services Administrator. She shared that Wellpath has a contract with "*Language Line Solutions*" to assist with medical and mental health translation services for BEU inmates. This auditor was able to review Wellpath's contract and access code with "*Language Line Solutions*." This auditor also tested the "*Language Line Solutions*" number and access code. Once Wellpath's access code was input, this auditor was provided access to a representative to assist with various language translations.

This auditor recommended that ARDOC establish a documented formal collaborative partnership with WellPath to allow the use of Wellpath's "*Language Line Solutions*" or ARDOC establish a formal language service for staff BEU access needs for BEU LEP inmates. Once this documented collaboration is formalized/established or an independent formal language line service is established, this auditor recommended BEU facilitate an "*All Staff Training*" on the purpose and how to access the language line to assist with translation services for BEU inmates as well as the staff within the facility that speak Spanish and can translate when needed. This PREA auditor concluded that Barbara Ester Unit (BEU) was not in compliance with PREA Standard 115.16. Corrective Action was required.

During Barbara Ester Unit (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and email correspondence with ARDOC's PREA Coordinator (PC) and BEU's Deputy Warden/PREA Compliance Manager (DW/PCM). The goal was to discuss the recommended corrective actions needed to meet compliance with this standard. After the meetings and email correspondence, ARDOC's PREA Coordinator submitted multiple email evidence that ARDOC and Wellpath established a collaborative agreement to allow ARDOC/SWACCC staff to utilize their "*Voyce Global/Language Line Solutions Translation/Interpreter Line,*" as well as procedures for use. This correspondence applies to all ARDOC facilities, because of Wellpath's global contract with ARDOC facilities. An excerpt from

	<p>the collaboration states, <i>“Wellpath provides Arkansas Department of Corrections with access to the language line anytime there is need. Please see attachment for instructions on the usage of Voyce Global Language Line.”</i></p> <p>Additionally, BEU’s DW/PCM submitted BEU’s evidence of <i>“All Supervisory Staff Email”</i> (9/5/25) sharing the purpose of BEU’s language line, where to access the language line, and how to use the interpreter line titled, <i>“Language Line Solutions.”</i> Finally, BEU’s DW/PCM submitted photo evidence of their <i>“Voyce Global/Language Line Solutions”</i> procedures or use and access code posted in BEU’s lieutenants and captains office, as well as in BEU’s infirmary.</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.16.</p>
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115.17	Hiring and promotion decisions
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.17. Barbara Ester Unit (BEU) submitted their Arkansas Department of Corrections Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.17. An excerpt states, <i>“The DOC shall perform a criminal background record check before enlisting the services of any Contractor who may have contact with Offenders. b. The DOC shall conduct criminal background record checks at least every five years of current employees and Contractors who may have contact with Offenders.”</i></p> <p>This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and concluded that it has the necessary language to align with PREA Standard 115.17.</p> <p>This PREA auditor interviewed ARDOC’s Human Resources Director. He shared that background checks are conducted on all employees and contractors. They further shared that background screenings include ACIC (Arkansas Crime Information Center), NCIC (National Crime Information Center) fingerprinting, Court Connect (Open Cases review system), and Employee reference Checks. When this auditor asked about conducting 5-year background checks (on employees and contractors) and “PREA Affirming Acknowledgement Disclosures” for employees, he shared that they have not been conducting background checks, at minimum, every 5 years of employees or contractors beyond their initial background checks. Furthermore, they have not been consistent in administering their “PREA Affirming Acknowledgement Disclosures” to all employees at hire, upon promotion, or as a part of performance reviews.</p>

While onsite, this auditor randomly selected 15 BEU employee files from an HR Manager/Liaison. This auditor reviewed the randomly selected files and observed that 14 out of 15 reviewed files had the new background checks between 7/01/24 through 7/25/24 completed. These new background checks that were to be completed were a result of this auditor's Agency Audit recommendation to ARDOC HR Director (at Headquarters), to conduct a sweeping background re-check of all ARDOC facility staff and contractors. This recommendation was to re-establish ARDOC's consistency in conducting initial background checks, promotional background checks and background checks at least every 5 years.

Additionally, this auditor verified that only 14 out of 15 BEU staff completed "PREA Affirming Acknowledgement Disclosures" between the dates of 7/01/24 through 7/25/24. These "PREA Affirming Acknowledgement Disclosures" are also a result of this auditor's Agency Audit recommendation to ARDOC HR Director (at Headquarters), to administer sweeping "PREA Affirming Acknowledgement Disclosures" to all ARDOC facility staff. This recommendation was to re-establish ARDOC consistency in requiring all staff to affirm/reaffirm that they have not engaged in previous misconduct under PREA Standard 115.17.

During this auditor's interview with the HR Manager/Liaison, this auditor asked how frequently these backgrounds are completed. The BEU's HR Manager/Liaison stated that she follows the newly implemented HR procedures to ensure that initial, promotional and annual checks occur as well as a "PREA Affirming Acknowledgement Disclosure" is completed annually (per ARDOC's HR Director directive given in January 2025). Contractors also receive initial background checks every five years.

This auditor asked ARDOC PREA Coordinator (PC) if ARDOC discloses former employee substantiation of sexual abuse or sexual harassment. ARDOC's PC shared Arkansas' Statute on providing references to prospective employers which states, "A current or former employer may disclose the following information about a current or former employee's employment history to a prospective employer of the current or former employee upon receipt of written consent from the current or former employee:

Date and duration of employment;

Current pay rate and wage history;

Job description and duties;

The last written performance evaluation prepared prior to the date of the request;

Attendance information;

Results of drug or alcohol tests administered within one (1) year prior to the request;

Threats of violence, harassing acts, or threatening behavior related to the workplace or directed at another employee;

Whether the employee was voluntarily or involuntarily separated from employment and the reasons for the separation; and

Whether the employee is eligible for rehire."

This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.17.

115.18	Upgrades to facilities and technologies
	<p data-bbox="256 188 959 224">Auditor Overall Determination: Meets Standard</p> <p data-bbox="256 264 544 300">Auditor Discussion</p> <p data-bbox="256 340 1481 542">This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.18.</p> <p data-bbox="256 577 1473 990">While onsite, this auditor interviewed Barbara Ester Unit (BEU) Superintendent who shared that notable upgrades for expansion have not occurred in the facility within the last three years. This facility was remodeled and opened in 2018. They currently have 170 cameras that are operational. This auditor also interviewed ARDOC’s PREA Coordinator who also confirmed that there have been no facility upgrades in the last 3 years. Finally, BEU’s Superintendent shared that BEU considers their ability to protect inmates from sexual abuse when coordinating video monitoring implementation and placement. This auditor observed that each inmate within the facility is issued a tablet at no cost. Finally, this PREA auditor’s site review will assist BEU in identifying blind spot locations and needs for video monitoring.</p> <p data-bbox="256 1025 1473 1102">This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.18.</p>

115.21	Evidence protocol and forensic medical examinations
	<p data-bbox="256 1312 959 1348">Auditor Overall Determination: Meets Standard</p> <p data-bbox="256 1388 544 1424">Auditor Discussion</p> <p data-bbox="256 1464 1481 1957">This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.21. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.21. An excerpt states, <i>“In coordination with the outside facility, the designated Staff shall request the forensic medical examination be performed by a Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) or other qualified medical practitioner. The efforts to provide SAFEs or SANEs shall be documented. The examination shall be at no cost to the Victim.</i></p> <p data-bbox="256 1993 1481 2069"><i>Medical care and forensic medical examinations are separate and different procedures. The Victim shall have a right to refuse either. Victims may be encouraged</i></p>

but shall not be forced to consent to a forensic medical examination. However, the Victim may refuse consent to the forensic medical examination and still consent to and receive medical care.

The Victim shall be offered victim advocate services. If requested, the advocate service shall be contacted and given the appropriate information in order to assist the Victim through the forensic examination and investigation process.”

This auditor also reviewed ARDOC’s Coordinated Response Plan which states, *“If requested by the victim, a victim advocate, qualified agency staff member, or qualified community-based organization, a DOC staff member will accompany and support the victim through the forensic medical examination process and investigatory interviews. Their role is to provide emotional support, crisis intervention services, information, and referrals. Please contact your facility PCM for a list of qualified agency staff members.”*

This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and “Coordinated Response Plan,” concluding that it has the necessary language to align with PREA Standard 115.21.

While onsite, this auditor interviewed BEU’s Chaplin, who shared that he received 4 hours specialized training through ARDOC’s PREA Coordinator to be the staff victim advocate. He further shared that he would be the first line of contact for support and advocacy. This auditor reviewed the Victim Advocacy certificate as verification of training. This auditor did not receive any additional victim advocate training certificates. ARDOC’s PC submitted the *“Sexual Assault Victim Advocacy Training Acknowledge Form”* electronically as evidence of compliance with this 115.53 PREA Standard. This auditor also reviewed ARDOC’s victim’s advocate training PPT curriculum (50 slides), as well as accompanying supplemental individual/groups exercises and scenario exercises.

This auditor also interviewed WellPath’s Health Services Administrator and Mental Health Director who shared that BEU transports victim inmates to *“The University of Arkansas for Medical Sciences Hospital”* for Sexual Abuse Nurse Examinations/Sexual Abuse Forensic Examinations (SANE/SAFE). They further shared that BEU’s staff victim advocates would provide emotional support at the *“The University of Arkansas for Medical Sciences Hospital”* to BEU sexual abuse victims needing to go out for SANE/SAFE services. When interviewing the Chaplin, BEU’s victim advocate, he shared that he would likely be called upon first and he would be support. Finally, BEU utilizes the *“Arkansas State Police”* (ASP) for all PREA sexual abuse criminal investigations.

Additionally, while on site, this auditor interviewed a random selection of 32 BEU inmates. When this auditor asked about their knowledge of victim advocacy services provided for inmates at BEU, 0 out of the 32 inmates knew who the BEU Victim Advocate was and were unaware that BEU’s advocates are for inmate victims of sexual abuse and emotional support for all BEU inmates.

Furthermore, this auditor interviewed a random selection of 10 BEU direct supervision

staff. This auditor shared a scenario with each direct supervision staff. This auditor shared a scenario of a sexual assault occurring in the shower area, the victim immediately runs out and reports the assault to the direct supervision staff. Many knew their responsibilities if they were first to be informed, notified, or observe sexual abuse/sexual harassment of an inmate. Eight out of 10 interviewed direct supervision staff were able to share their duties to preserve the potential crime scene to preserve usable evidence without auditor prompting. Finally, this auditor reviewed BEU's training curriculum, which contained all the first responder duty deliverables within its information.

This auditor recommended that BEU identify and provide specialized training for a minimum of 2 additional victim advocates in addition to BEU's Chaplain. This auditor also recommended that the victim advocates develop formal procedures if a Victim Advocate is needed. A victim advocate should know their responsibilities, what to do when called upon to serve in that capacity, and what the procedures are in the event they are needed. This auditor also recommended that all BEU inmates receive "*Refresher Education*" focused on who the BEU victim advocates are at the facility, their role and purpose, and how to access them if needed. Inmates should be aware that BEU's specialized trained Victim Advocates provide victim advocacy and emotional support to all BEU inmates. This PREA auditor concluded that Barbara Ester Unit (BEU) was not in compliance with PREA Standard 115.21. Corrective Action was required.

During Barbara Ester Unit's (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and email correspondence with ARDOC's PREA Coordinator (PC) and BEU's Deputy Warden/PREA Compliance Manager (DW/PCM). The goal was to discuss the recommended corrective actions needed to meet compliance with this standard. After the meetings and email correspondence, Barbara Ester Unit's DW/PCM submitted the training transcripts of BEU's Chaplain and Training Officer as BEU's 2 specialized trained PREA Victim Advocates (training dated 3/20/25). BEU's DW/PCM also submitted photo evidence of a Victim Advocate informational/flyer posted on the wall in Beu's Inmate Library, Inmate Information Board by the Master Control Room, BEU's Main Hallway, and Main Hall-West End. Additionally, the informational/flyer has also been added to BEU's "*Inmate Morning Show's*" layout of information daily. BEU's "*Inmate Morning Show*" is a major avenue of disseminating and communicating information to all BEU inmates daily.

Finally, BEU's DW/PCM submitted BEU's "*Shift Briefings*" discussion notes and attendance roster (from 9/9/25 through 9/15/25), as evidence of "*Staff Refresher Training*" on who BEU's victim advocates are, their roles, and how to provide inmates access to BEU's victim advocates. Victim Advocate refresher discussions occurred daily for 7 days during "*Shift Briefings*" to ensure that all staff shifts and schedules receive the information. If specific staff were absent on one day, the information would still be available and discussed on their following days during this "*Shift Briefing*" 7-day window.

This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.21.

115.22	Policies to ensure referrals of allegations for investigations
	<p data-bbox="256 188 959 224">Auditor Overall Determination: Meets Standard</p> <p data-bbox="256 264 544 300">Auditor Discussion</p> <p data-bbox="256 340 1481 748">This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.22. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.22. An excerpt states, <i>“All allegations of Sexual Abuse and Sexual Harassment shall be promptly, thoroughly, and objectively investigated, including third-party and anonymous reports.</i></p> <p data-bbox="256 788 1481 949"><i>A PREA investigation shall be initiated within twenty-four (24) hours of the incident upon report to the facility or DOC investigator or as soon as possible if referred for investigation to the Arkansas State Police (ASP). ASP shall be notified once the quality of evidence appears to support criminal prosecution.</i></p> <p data-bbox="256 990 1449 1151"><i>Notifications for the purpose of an investigation shall be immediately made to the designated facility or DOC investigator. In addition, all allegations of Sexual Abuse that involve potentially criminal behavior shall be referred for criminal investigation to the Arkansas State Police (ASP).”</i></p> <p data-bbox="256 1191 1437 1263">This auditor reviewed “ARDOC’s Secretarial Directive (2024-02),” concluding that it has the necessary language to align with PREA Standard 115.22.</p> <p data-bbox="256 1303 1481 1845">While onsite, this auditor also interviewed 3 BEU Administrative PREA Investigators assigned to investigations. This auditor shared a scenario of an inmate being sexually assaulted in the shower, and asked, <i>“What is the PREA Investigator’s coordinated responsibilities?”</i> All investigators knew their responsibilities of evidence collection, Miranda/Garrity rights, interviewing procedures, understanding victim trauma, and investigation report-writing protocols. The investigators identified the specialized training they received regarding investigating sexual abuse in confinement facilities. This auditor reviewed all interviewed PREA investigator’s training transcript submitted by ARDOC’s PREA Coordinator. These training transcripts verified the specialized training all ARDOC PREA investigators received training through ARDOC’s 3-day <i>“Sexual Assault Investigation’s Training.”</i> This auditor reviewed “ARDOC’s Coordinated Response Plan,” which aligned with ARDOC’s PREA Investigator’s interview responses.</p> <p data-bbox="256 1886 1469 2092">Furthermore, ARDOC’s PREA Coordinator shared that ARDOC partners with “Arkansas State Police” (ASP), which is responsible for conducting PREA criminal investigations. This auditor verified this partnership through a call to ASP, who verified being the entity to conduct criminal investigations for ARDOC facilities. This auditor also reviewed ARDOC’s <i>“Coordinate Response Plan Manual.”</i> This manual describes the</p>

	<p>ARDOC’s responsibilities when conducting PREA administrative investigations. Moreover, this auditor interviewed a random selection of 20 BEU specialized and direct supervision staff, 18 of 20 responded confidently to their knowledge as first responders and coordinated response. Finally, this auditor reviewed ARDOC’s website (Prison Rape Elimination Act (PREA) - Arkansas Department of Corrections) and observed their PREA Investigations policy which states, <i>“All allegations of sexual abuse are taken seriously. The ARDOC accepts all reports of sexual abuse or sexual harassment whether made verbally, in writing, anonymously, or from third parties. All allegations will be thoroughly investigated by the PREA Coordinator. There is no time limit on when an incident of sexual abuse or sexual harassment can be reported.”</i></p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.22.</p>
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115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.31. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.31. An excerpt states, <i>“Staff Training shall be tailored to be gender specific to the primary facility of each Staff member. All employees shall receive training annually in the following;</i></p> <ul style="list-style-type: none"> <i>i. The DOC’s zero-tolerance policy for Sexual Abuse and Sexual Harassment.</i> <i>ii. Their responsibilities of Sexual Abuse and Sexual Harassment prevention, detection, reporting, and response policies and procedures.</i> <i>iii. Offenders’ right to be free from Sexual Abuse and Sexual Harassment.</i> <i>iv. The right of Offenders and Staff to be free from Retaliation for reporting Sexual Abuse and Sexual Harassment.</i> <i>v. The dynamics of Sexual Abuse and Sexual Harassment in confinement.</i> <i>vi. The common reactions of Sexual Abuse and Sexual Harassment victims.</i> <i>vii. How to detect and respond to signs of threatened and actual Sexual Abuse.</i> <i>viii. How to avoid inappropriate relationships with Offenders.</i>

ix. How to communicate effectively and professionally with an Offender, including LGBTI or GNC Offenders.

x. How to comply with relevant laws related to mandatory reporting of Sexual Abuse to outside authorities.”

This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and concluded that it has the necessary language to align with PREA Standard 115.31.

While onsite, this PREA auditor interviewed BEU’s Unit Training Supervisor who shared that new hire staff go through two weeks of an “*On the Job Training*” course at the facility as well as four weeks in the Basic Corrections Officer Training Academy (BCOT) where both areas train on PREA. She continued to share that security staff are also required to attend annual in person PREA training and, if missed, complete annual web-based PREA training. Additionally, they stated that they conduct “*15-minute briefings*” on 23 different PREA topics to keep security staff abreast of responsibilities regarding PREA efforts within the facility. Moreover, this auditor interviewed 27 randomly selected direct supervision staff, specialized, support, volunteer, and contractors. The direct supervision, specialized, volunteers and contractors acknowledged receiving PREA New Hire and/or PREA initial training as well as participating in annual refresher trainings.

This auditor also requested, received, and viewed the training files of the 15 randomly selected staff interviewed to verify up-to-date annual PREA training.

Fourteen out of 15 employee trainings were verified. The training information showed each staff member’s training verification of attendance either in-person or web-based training. This auditor also reviewed the classroom in-person Power Point employee training curriculum, the Power-Point volunteer/contractor training curriculum and the **RELIAS** web-based annual refresher training curriculum. The employee and volunteer Power Point content as well as the web-based training covered the necessary components identified in PREA Standard 115.31 specifically discussing zero tolerance, first responder duties, inmate rights, how to detect and respond as well as effectively communicating any incidents of sexual abuse and sexual harassment.

This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.31.

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files

reviewed and observations to determine compliance for Standard 115.32. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.32. An excerpt states, “All Volunteers and Contractors who have contact with Offenders shall be trained annually on the following:

i. The DOC’s policy of zero-tolerance regarding Sexual Abuse and Sexual Harassment and how to report such incidents.

ii. Their responsibilities under the DOC’s Sexual Abuse and Sexual Harassment policies and procedures.

b. Training shall be based on the level and amount of contact the Volunteer or Contractor has with Offenders”

This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and has concluded that it has the necessary language to align with PREA Standard 115.32.

While onsite, this PREA auditor interviewed the Unit Training Supervisor and seven randomly selected contractors (4) and volunteers (3). They acknowledged receiving PREA training and refresher training. All interviewed were able to thoroughly share their responsibilities if informed, observe, or gain knowledge of sexual abuse or sexual harassment. The Unit Training Supervisor shared that they do not require contractors who have minimal/infrequent interaction with inmates to sign a “Contractor/Volunteer Acknowledgement Form” as a condition of entry into the facility.

Further, this auditor also interviewed the BEU Chaplain who shared that all volunteer/contractor’s undergo a 2-day/16-hour training at ARDOC’s Academy before they receive an official volunteer badge. He shared that there are three levels of entry for certain volunteers. There are **OCV’s** (Occasional Citizen Volunteers) who come in periodically to serve and are escorted at all times at the facility. There are **RCV’s** (Regular Citizen Volunteers) who receive 10 hours of additional training, they can be in the facility unescorted and require a badge after additional training is completed.

The last level is the **CRA** (Certified Religious Assistant Volunteers) who receive 40 hours of additional training, are required to escort OCV volunteers and volunteer on a consistent basis. This auditor also requested the training files of four randomly selected volunteers however it was not received at the conclusion of the onsite audit.

Additionally, ARDOC’s PREA Coordinator submitted the “PREA Contractor/Volunteer Training” power point and “Contractor/Volunteer Acknowledgement Form.” The Power Point training had 36 slides that discussed the origins of PREA, protection from retaliation for reporting, the dynamics of sexual abuse in carceral settings, the responsibilities to prevent, detect, report and respond as volunteers/contractors and how to maintain professional communication with inmates. The power point training and acknowledgement form covered the components identified in PREA Standard 115.31 and 115.32.

	<p>This auditor recommended that BEU provide <i>“PREA Contractor/Volunteer Training”</i> verification of all “frequent” BEU volunteers. This auditor also recommended that BEU utilize ARDOC’s <i>“Contractor/Volunteer Acknowledgement Form.”</i> to be reviewed and signed upon entry into BEU, by contractors and volunteers, who have “limited contact/infrequent contact” with BEU inmates. Finally, all current contractors who have not signed should sign this ARDOC’s <i>“Contractor/Volunteer Acknowledgement Form.”</i> verification, then submitted to determine compliance. This PREA auditor concluded that Barbara Ester Unit (BEU) was not in compliance with PREA Standard 115.32. Corrective Action was required.</p> <p>During Barbara Ester Unit’s (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and email correspondence with ARDOC’s PREA Coordinator (PC) and BEU’s Deputy Warden/PREA Compliance Manager (DW/PCM). The goal was to discuss the recommended corrective actions needed to meet compliance with this standard. After the meetings and email correspondence, BEU’s Deputy Warden/PREA Compliance Manager submitted ARDOC’s <i>“Non-Security PREA Training”</i> attendance roster, which had 12 volunteers in signed in attendance (training date 1/13/25). BEU’s Deputy Warden/PREA Compliance Manager also submitted photo evidence of the entrance of BEU’s facility and the clipboard with <i>“Supervised Volunteer Acknowledgement Forms”</i> for those infrequent volunteers/contractors, as well as 1 signed/dated completed form from BEU’s most recent infrequent volunteer. Finally, all “Wellpath” contracted medical and mental health staff are required to complete their PREA Training through <i>“Wellpath Academy,”</i> prior to interacting with ARDOC inmates.</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.32.</p>
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115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.33. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with 115.33. An excerpts states, <i>“During the intake process and at each facility, each Offender shall receive oral and written information about the DOC’s zero-tolerance policy regarding Sexual Abuse and Sexual Harassment and how to report incidents or suspicions of Sexual Abuse or Sexual Harassment.”</i></p>

1. *Each facility shall provide Offender education in formats accessible to all Offenders, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, and for Offenders who have limited reading skills. Use of Offender interpreters for assistance in Offender education on aspects of the DOC's efforts to prevent, detect, and respond to Sexual Abuse and Sexual Harassment shall be prohibited except in circumstances where extended delay in obtaining an effective interpreter could compromise the Offender's safety.*
2. *Each facility shall maintain documentation of participation in Offender education.*
3. *Each facility shall ensure that key information is continuously and readily available or visible to Offenders, such as posters and Offender handbook materials that explain the zero-tolerance policy and different ways to report."*

This auditor reviewed "ARDOC's Secretarial Directive (2024-02)" and concluded that it has the necessary language to align with PREA Standard 115.33.

While onsite, this auditor interviewed BEU's Classification Officer, who leads inmate Education provided the "PREA Education Acknowledgement" that was missing many critical components of comprehensive PREA Education. She shared the intake process that occurs 24 to 72 hours after entry into the facility which entailed her reading major points of the PREA pamphlet and inmate handbook. She provides the information to them thereafter. It was noted that at that time of the onsite audit they did not read the material out loud to inmates consistently during the intake process and the PREA video was not shown. This auditor requested the orientation documents for inmates that received PREA information at intake but did not receive these documents while onsite. After the interview with the Classification officer, this auditor did provide the "*PREA Offender Education Checklist*" and PREA videos in English and Spanish via email.

Furthermore, BEU's Classification Officer shared that PREA Comprehensive Education is not currently being done within the 30-day period of inmates.

This auditor discussed the components needed for both orientation and education. During this audit, an updated process was discussed which entailed inmates receiving PREA Orientation with a PREA video (offering in English and Spanish), a copy of the PREA pamphlet that is read aloud. Then within the 30-day period, PREA Education will ensue by inmates viewing the PRC disseminated PREA Education video (Spanish and English), providing a question-and-answer session upon completion of the viewed video and reviewing & initialing ARDOC's "*PREA Offender Education Checklist*." The "*PREA Offender Education Checklist*" entailed BEU's zero tolerance for sexual abuse/sexual harassment, inmate's rights, ways to report at BEU, and access to victim advocacy and emotional support. Finally, the "*PREA Offender Education Checklist*" is signed by the staff providing the PREA education and the inmate acknowledging their receipt and understanding. This auditor informed the Classification Officer that it was important for inmates to have a PREA pamphlet in English or Spanish to refer to as well as the importance of the pamphlet information

to be read to the BEU inmates during the education process as some inmates experience difficulty reading and understanding.

This auditor also interviewed 32 randomly selected BEU inmates. When this auditor asked each if they received PREA education during their intake, 4 out of 32 shared that they did receive PREA education. Ten out of 32 inmates shared that they did not remember receiving PREA education or viewing the PREA video during PREA Education and could not share details of their PREA education (video, brochure, or checklist review). Eighteen out of 32 inmates stated that they had not received PREA education at all.

Finally, during the onsite review, this auditor observed that BEU's PREA posted reporting signage were in English and Spanish. This auditor did provide additional resources for the PRC PREA videos that also provide American Sign Language and Closed Caption as well. This auditor discussed other communicative avenues for an inmate to report PREA. ARDOC's PREA Coordinator shared that posters were approximately a 5th grade reading level placed at a height where those physically impaired can view. This was verified by this auditor.

This auditor recommended all current BEU inmates receive "*PREA Refresher Education*" which should entail: **1)** BEU inmates viewing the PREA Education video; **2)** BEU's facilitating staff read the "*PREA Offender Education Checklist*" to all inmates then have them to initial and sign acknowledgement; **3)** Review who the victim advocates at the facility are, their purpose and how to get in touch with them; **4)** Share inmate access to CLEST, including address, and that such mail would be treated as legal mail (if the inmate wishes to be anonymous does not have to put their name or ID on the letter); and **5)** Give each BEU inmate a PREA pamphlet for them to keep.

This auditor also recommended that, (going forward) newly admitted inmates should receive "*PREA Information*" (at intake) in the following manner (or similar):

1. *BEU assigned intake staff should show the intake inmates the "PREA Intake Video" (4-6 minutes long) in English or Spanish; then*
2. *BEU's assigned intake staff should read the PREA pamphlet to all inmates.*
3. *BEU's assigned intake staff give each BEU inmate a PREA pamphlet for them to keep.*
4. *Finally, BEU's assigned intake staff should have the inmates sign the "Receipt of ADC Inmate PREA Orientation" acknowledgement sheet, verifying the inmate viewed the video, reviewed the PREA pamphlet, and the inmate understands the information.*

Additionally, this auditor recommended that, (going forward), within 30 days of each newly admitted inmate's intake, BEU should provide "*Comprehensive PREA Education*" in the following manner (or similar):

1. *BEU assigned intake staff should show the inmates the "PREA Education*

- Video" (14-16 minutes long); then*
- 2. BEU's assigned intake staff should read the "PREA Offender Education Checklist" to inmates and have the inmates initial each section (to ensure understanding throughout, ask inmates if they understand and if they have any additional questions). They should also share inmate access to the Arkansas "Commission on Law Enforcement Standards and Training" (CLEST). CLEST is ARDOC's external reporting entity, who receives inmate and inmate reports of sexual abuse. Inmates should be informed about this avenue for reporting, how to access it and that it is treated as legal mail (if the inmate wishes to be anonymous does not have to put their name or ID on the letter). They should also be told about victim advocacy, who the BEU victim advocates are and their purpose; then*
 - 3. Have each inmate sign the acknowledgement at the bottom of the "PREA Offender Education Checklist."*
 - 4. Properly file the "PREA Offender Education Checklist" as evidence of compliance*

This PREA auditor concluded that Barbara Ester Unit (BEU) was not in compliance with PREA Standard 115.33. Corrective Action was required.

During Barbara Ester Unit's (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and email correspondence with ARDOC's PREA Coordinator (PC) and BEU's Deputy Warden/PREA Compliance Manager (DW/PCM). The goal was to discuss the recommended corrective actions needed to meet compliance with this standard. After the meetings and email correspondence, this auditor requested to see the PREA Orientation and PREA Comprehensive Education of 26 randomly selected BEU inmates. BEU's Deputy Warden/PREA Compliance Manager (DW/PCM) submitted 26 initialed, acknowledged, and signed BEU "PREA Education Acknowledgements" (BEU's inmate PREA orientation acknowledgements at intake) and 26 initialed, acknowledged and signed "PREA Offender Education Checklist" (PREA Inmate Comprehensive Education), as evidence of providing "PREA Refresher Education" to BEU's inmates. BEU's "PREA Offender Education Checklist" entailed education on BEU's zero tolerance policy, inmates rights to be free from sexual abuse and harassment, multiple ways to report at BEU, external reporting through Arkansas *Commission on Law Enforcement Standards and Training* (CLEST), Grievance reporting, 3rd Party Reporting, PREA allegations will be investigated, as well as victim advocacy education and available access through specialized trained staff victim advocates.

Additionally, BEU's DW/PCM submitted an example of a full "PREA Inmate Orientation Packet," and an example of a full "PREA Comprehensive Education Packet," as evidence of revisions to the PREA Orientation (at intake) and PREA Comprehensive Education process (within 30 days of intake). Finally, BEU submitted their updated PREA "End the Silence" pamphlet (English and Spanish versions) which has been personalized to BEU. This pamphlet's contained all the inmate education shared within the "PREA Offender Education Checklist," as well as the names of BEU's victim advocates and their availability for emotional support on its front page and within its

	<p>contents.</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.33.</p>
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115.34	Specialized training: Investigations
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.34. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.34. An excerpt states, <i>“All employees who conduct Sexual Abuse investigations shall receive specialized training in conducting such an investigation in a confinement setting. The training shall include:</i></p> <ul style="list-style-type: none"> <i>a. Interviewing techniques for Sexual Abuse Victims.</i> <i>b. Proper use of Miranda and Garrity warnings.</i> <i>c. Sexual Abuse evidence collection in confinement settings.</i> <i>d. Criteria and evidence required to substantiate a case for administrative action or prosecution referral.”</i> <p>This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and concluded that it has the necessary language to align with PREA Standard 115.34.</p> <p>While onsite, this auditor also interviewed 3 BEU Administrative PREA Investigators assigned to investigations. This auditor shared a scenario of an inmate being sexually assaulted in the shower, and asked, <i>“What is the PREA Investigator’s coordinated responsibilities?”</i> All investigators knew their responsibilities of evidence collection, Miranda/Garrity rights, interviewing procedures, understanding victim trauma, and investigation report-writing protocols. Finally, this auditor reviewed “ARDOC’s Coordinated Response Plan,” which aligned with ARDOC’s PREA Investigator’s interview responses.</p> <p>Furthermore, BEU’s investigators identified the specialized training they received regarding investigating sexual abuse in confinement facilities. This auditor reviewed all seven interviewed PREA investigator’s training transcript/report submitted by ARDOC’s PREA Coordinator. These training transcripts/reports verified the specialized training all ARDOC PREA investigators received training through ARDOC’s 3-day (24</p>

	<p>hours) <i>“Sexual Assault Investigation’s Training.”</i> This PREA auditor also reviewed ARDOC’s 6 module <i>“Sexual Abuse Investigator’s Training (SAIT)”</i> in OAS, as evidence of compliance. All modules covered the necessary topics related to PREA’s investigation standards. The modules topics are as follows:</p> <ol style="list-style-type: none"> 1. <i>Legal Issues and Liability</i> 2. <i>PREA Standards for Investigations</i> 3. <i>1st Responder Duties</i> 4. <i>Medical & Mental Health Care</i> 5. <i>Evidence Collection and</i> 6. <i>PREA Investigations: “Adult Interviewing and Report Writing.”</i> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.34.</p>
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115.35	Specialized training: Medical and mental health care
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.35. Barbara Ester Unit (BEU) submitted their <i>“Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” #1D-03</i> as evidence of compliance with PREA Standard 115.35. An excerpt states, <i>“All full and part-time medical and mental health care practitioners who work regularly in the facility shall receive specialized training on the following:</i></p> <ol style="list-style-type: none"> <i>a. How to detect and assess signs of Sexual Abuse and Sexual Harassment.</i> <i>b. How to preserve physical evidence of Sexual Abuse.</i> <i>c. How to respond effectively and professionally to Victims of Sexual Abuse and Sexual Harassment.</i> <i>d. How and to whom to report allegations or suspicions of Sexual Abuse and Sexual Harassment.”</i> <p>This auditor reviewed <i>“ARDOC’s Secretarial Directive (2024-02)”</i> and concluded that it has the necessary language to align with PREA Standard 115.35.</p> <p>ARDOC’s PC submitted ARDOC’s specialized training for medical and mental health staff titled, <i>“Medical and Mental Health Care”</i> as evidence of compliance. This auditor</p>

reviewed the *“Medical and Mental Health Care”* training which ARDOC utilizes to specialize train medical and mental health staff. This training has all the components to align with this 115.35 PREA Standard. The curriculum contained 54 slides that provided comprehensive education on how to detect and assess signs of sexual abuse and harassment, how to preserve physical evidence, how to respond effectively and professionally to victims and how and whom to report allegations or suspicions of sexual abuse and harassment.

Additionally, while on site, this auditor conducted an exhaustive site review/tour of BEU and observed the medical triage area. This auditor interviewed WellPath’s Health Services Administrator (HSA) and Mental Health Director who shared that all medical and mental health professionals within the facility complete PREA initial/new hire training through WellPath’s *“WellPath Academy”* training course. WellPath staff also receive annual refresher training through **RELIAS** web-based training. However, during this auditor’s interview with WellPath’s HSA and Mental Health Director, they were unable to provide documentation/evidence of medical or mental health contracted staff receiving ARDOC’s specialized *“Medical and Mental Health Care”* training or any other specialized training for medical and mental health providers.

This auditor recommended that all medical and mental health staff serving inmates at BEU take specialized training for mental health and medical professionals. This PREA auditor concluded that Barbara Ester Unit (BEU) was not in compliance with PREA Standard 115.35. Corrective Action was required.

During Barbara Ester Unit’s (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and email correspondence with ARDOC’s PREA Coordinator (PC) and BEU’s Deputy Warden/PREA Compliance Manager (DW/PCM). The goal was to discuss the recommended corrective actions needed to meet compliance with this standard. After the meetings and email correspondence, ARDOC’s PREA Coordinator developed/created a PREA specialized Power Point training, addressing the Medical and Mental Health role when working with inmates in confinement settings. ARDOC’s Medical and Mental Health contractor Wellpath, made this training a part of their required *“Wellpath Academy”* annual online trainings. ARDOC’s PREA Coordinator This auditor reviewed the PPT trainings titled, *“ARDOC Medical Specialized Training for PREA”* and *“ARDOC Mental Health Specialized Training for PREA.”*

This auditor reviewed both trainings whose components align with PREA Standard 115.35. The curriculum contains 35 slides for Medical staff and 29 slides for the Mental Health staff, focused on **1)** how to detect and assess signs of sexual abuse and harassment, **2)** how to preserve physical evidence, **3)** how to respond effectively and professionally to victims, and **4)** how and whom to report allegations or suspicions of sexual abuse and harassment. Finally, BEU’s Deputy Warden/PCM submitted transcripts, showing 30 BEU Medical and Mental Health staff having completed *“ARDOC Medical Specialized Training for PREA”* and *“ARDOC Mental Health Specialized Training for PREA.”*

This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.35.

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	<p data-bbox="256 262 544 293">Auditor Discussion</p> <p data-bbox="256 338 1477 831">This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.41. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.41. An excerpt states, <i>“Each Offender shall be assessed during the intake screening within seventy-two (72) hours of arrival and upon each transfer to another facility. Each objective risk screening shall be face to face and include a review of any history of Sexual Abuse-Victimization or sexually predatory behavior. Only Staff who have completed PREA screening training may administer the assessment.</i></p> <p data-bbox="256 875 1437 987"><i>The assessment report shall be completed in the Electronic Offender Management Information System (eOMIS). The PREA screening shall consider, at a minimum, the following criteria to assess an Offender for risk of sexual victimization:</i></p> <ul data-bbox="344 1021 1453 1675" style="list-style-type: none"> <li data-bbox="344 1021 1430 1055"><i>a. Whether the Offender has a mental, physical, or developmental disability;</i> <li data-bbox="344 1099 730 1133"><i>b. The age of the Offender;</i> <li data-bbox="344 1167 871 1200"><i>c. The physical build of the Offender;</i> <li data-bbox="344 1234 1174 1267"><i>d. Whether the Offender has previously been incarcerated;</i> <li data-bbox="344 1301 1302 1335"><i>e. Whether the Offender’s criminal history is exclusively nonviolent;</i> <li data-bbox="256 1368 1453 1458"><i>f. Whether the Offender has prior convictions for sex offenses against an adult or child;</i> <li data-bbox="328 1491 1214 1525"><i>g. Whether the Offender is or is perceived to be LGBTI or GNC;</i> <li data-bbox="328 1559 1437 1592"><i>h. Whether the Offender has previously experienced sexual Victimization; and</i> <li data-bbox="328 1626 1046 1659"><i>i. The Offender’s own perception of vulnerability..”</i> <p data-bbox="256 1704 1477 1783">This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and concluded that it has the necessary language to align with PREA Standard 115.41.</p> <p data-bbox="256 1816 1477 2074">While on site, this auditor reviewed the PREA Risk Screening tool in ARDOC’s “eOmis” system (electronic offender management system). After combing through the risk assessment tool, this auditor observed that any inmate screened having history of sexual victimization are automatically identified as “high risk of victimization” by the system. However, when any inmate screened having history of sexual abusiveness/ perpetration, they are not automatically identified as “high risk of abusiveness/</p>

perpetration” by the system. The system requires two additional categorical question boxes to be checked before the screened inmate would be identified as “high risk of abusiveness/perpetration.”

Furthermore, when this auditor asked BEU’s Intake/Classification Officer about BEU’s “30-day PREA Risk Screening Reassessments,” she shared that “30-day PREA Risk Screening Reassessments” for inmates are not currently being completed.

Finally, while onsite, this auditor requested to see a random selection of 32 inmate “PREA Risk Screenings” in “eOmis.” BEU was unable to show this auditor completed “PREA Risk Screenings.” This auditor also interviewed a random selection of BEU inmates. This auditor asked each if they recalled being asked specific screening questions when they arrived (this auditor detailed the specific questions that were asked). There were 6 out of the 32 interviewed inmates who shared that they did recall being asked those specific screening questions. There was 1 out of the 32 interviewed inmates who shared that they recall being asked these similar screening questions again (30-day Reassessments). Twenty-five inmates shared that they did not receive a screening upon intake or within a 30-day period after arrival to the facility.

This auditor recommended that BEU conduct a “PREA Risk Re-Screening” on all BEU inmates. Each screening should be conducted in-person where the inmate can respond to the questions individually, and in a setting away from other inmates. This auditor also recommended ARDOC calibrate their “PREA Risk Screening” tool in “eOmis” to have the threshold which identifies “risk of abusiveness/perpetration” align with the threshold which identifies “risk of victimization.”

Additionally, this auditor recommended that BEU establish a documented system that ensures that all BEU inmates receive “30-day PREA Risk Screenings Reassessments” within 30-days of their intake to BEU. This auditor also recommended that both the 30-day PREA Screening and the PREA Comprehensive Education take place at the same time. This auditor recommends BEU establish a consistency in practice of conducting “30-day PREA Risk Screening Reassessment” and other warranted “PREA Risk Reassessments” (based upon any additional, relevant information received by the facility since the intake screening) before compliance can be concluded. This PREA auditor concluded that Barbara Ester Unit (BEU) was not in compliance with PREA Standard 115.41. Corrective Action was required.

During Barbara Ester Unit’s (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and email correspondence with ARDOC’s PREA Coordinator (PC), with the goal of discussing the recommended corrective actions needed to meet compliance with this standard. After the meetings and email correspondence, on 5/1/25, ARDOC’s PREA Coordinator sent this auditor video evidence showing that ARDOC’s contractor who manages their “eOmis” system made the calibration corrections to their *PREA Risk Screening Tool* to have the threshold which identifies “risk of abusiveness” align with the threshold which identifies “risk of victimization.” Additionally, while this auditor was onsite conducting a PREA facility onsite at another ARDOC facility, this auditor tested ARDOC’s PREA

Risk Screening Tool in their agency-wide “eOmis” system. This auditor was able to verify and confirm that the calibration corrections were made.

BEU’s Deputy Warden/PREA Compliance Manager also submitted requested documentation of completed “*PREA Risk Reassessments*” for 26 randomly selected BEU inmates, to verify that PREA Risk Screenings have been completed for all BEU inmates. The reviewed inmates’ documentation showed that 26 out of 26 BEU inmates received a “*PREA Risk Screening*.” Twenty-four out of 26 received their “*Transfer-In PREA Risk Screening*” and “*30-day PREA Risk Screening Reassessment*” (1 inmate transferred out prior to their 30-day threshold).

Finally, ARDOC’s PREA Coordinator submitted a “*Memo*” to this auditor affirming that the Office of the PREA coordinator will commence to conducting quarterly checks to strengthen compliance monitoring and oversight. An excerpt from ARDOC’s PC’s “*Memo*” states, “*To strengthen PREA compliance oversight and provide ongoing support to all DOC-operated facilities, the Office of the PREA Coordinator will begin conducting Quarterly PREA Compliance Monitoring Reports effective September 1st, 2025.*”

Scope of Review:

Each quarterly review will include the following components:

1. ***PREA Screening Reviews*** – *A minimum of 20 PREA Screenings will be reviewed for accuracy, completeness, and timeliness.*
2. ***Offender Education*** – *Verification of Offender PREA Education Acknowledgment Forms for compliance with required delivery and documentation standards.*
3. ***Sexual Abuse Investigation Documentation*** – *Review of the following required documents for all applicable sexual abuse cases:*
 - *Retaliation Monitoring Assessments*
 - *Victim Notification Forms*
 - *Sexual Abuse Incident Reviews (SAIRs)*

Reporting Process:

- *The Office of the PREA Coordinator will compile a written report summarizing the findings for each facility.*
- *The report will be sent to both the PCM and the Warden to assist in tracking progress, identifying areas for improvement, and recognizing areas of excellence.*
- *Facilities will receive both an overall compliance score and individual scores by standard using the following scale:*

Score Rating Description

1. *Poor*
2. *Needs Improvement*
3. *Meets Expectations*
4. *Exceeds Expectations*

The purpose of this initiative is to provide consistent, structured feedback to ensure compliance with PREA Standards, strengthen facility practices, and maintain the highest level of inmate safety and staff accountability."

This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.41.

115.42 Use of screening information

Auditor Overall Determination: Meets Standard

Auditor Discussion

This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.42. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.42. An excerpt states, *“If an Offender scores “at risk” for victimization, the designated Staff shall label them as Victim Prone in eOMIS.*

If an Offender scores “at risk” for abusiveness, the designated staff shall label them as a Potential Sexual Predator in eOMIS.

The information from the PREA screening shall be used to make housing, bed, program, and work assignment decisions with the goal of keeping separate those Offenders who are prone to sexual Victimization from those who are prone to sexual aggression. The facility PCM is responsible for ensuring such separation.

Placement decisions regarding Transgender and Intersex Offenders shall be individualized.”

This auditor reviewed “ARDOC’s Secretarial Directive (2024-02),” concluding that it has the necessary language to align with PREA Standard 115.42.

While on site, this auditor reviewed the PREA Risk Screening tool in ARDOC’s “eOmis” system (electronic offender management system). After combing through the risk assessment tool, this auditor observed that any inmate screened having history of sexual victimization are automatically identified as “high risk of victimization” by the system. However, when any inmate screened having history of sexual abusiveness/

perpetration, they are not automatically identified as “high risk of abusiveness/perpetration” by the system. The system requires two additional categorical question boxes to be checked before the screened inmate would be identified as “high risk of abusiveness/perpetration.”

Additionally, during the interview with BEU’s Intake/Classification Officer, she shared that she is the primary one that completes the screenings. During the time of the audit, BEU’s Classification Officer shared that BEU is not currently considering PREA Risk Screening status when placing inmates into housing barracks, bunk assignments, work, and education programming, but did factor in size, disability, and sexual orientation into the housing assignment decisions however auditor shared the high possibility of “victim prone” inmates and “high risk of perpetration” inmates being placed together without the assistance of the objective screening tool. She shared that the medical and mental health team would be assuming the responsibility to administer the initial PREA screening in January 2025.

While onsite, this auditor requested to see a random selection of 32 inmate “PREA Risk Screenings” in “eOmis.” BEU was unable to show this auditor completed “PREA Risk Screenings.” This auditor also interviewed a random selection of BEU inmates. This auditor asked each if they recalled being asked specific screening questions when they arrived (this auditor detailed the specific questions that were asked). There were 6 out of the 32 interviewed inmates who shared that they did recall being asked those specific screening questions. There was 1 out of the 32 interviewed inmates who shared that they recall being asked these similar screening questions again (30-day Reassessments). Twenty-five inmates shared that they did not receive a screening upon intake or within a 30-day period after arrival at the facility.

Finally, this auditor interviewed 2 transgender inmates within the facility at the time of this onsite audit. Each inmate shared that they are not offered an opportunity to shower separately, pat and strip searches are conducted by male officers and housing considerations are not done on a case-by-case basis. This auditor did not observe any LGBTI-specific housing units or programs during this auditor’s exhaustive site review.

Finally, this auditor asked BEU’s Major and Deputy Warden/PCM if transgender inmate’s own perception of their safety is taken into serious consideration. Each stated that safety is a priority at BEU and any mistreatment by other inmates and/or staff can result in disciplinary action. During the site review/tour, this auditor observed the bathrooms utilized for all inmates. There was no formalized process in handling shower procedures for a transgender inmate.

This auditor recommended that Classification staff utilize BEU’s completed initial “PREA Risk Screening” to assist and inform how they complete housing, work and programming determinations for inmates with the goal of keeping separate those inmates who are screened as “victim prone” from those who are screened at “high risk of sexual abusiveness.” This auditor’s recommendation entailed the intake staff developing a way to document how BEU considers the PREA Risk Screening results in their decision to housing, bed, education, work, and program their inmates.

This auditor also recommended BEU provide “Refresher Training” to all BEU staff on

professional conduct with transgender/intersex inmates. This recommended training content should entail the following topics: defining LGBTI, professional interactions with transgender, pat/strip search procedures of transgender/intersex inmates, serious considerations of transgender/intersex inmate own perception of safety, allowing transgender/intersex inmates to shower opposite of the other BEU inmates. Finally, BEU's training curriculum and acknowledgement of staff attending the training should be documented and provided as evidence. BEU should reassess the housing assignments, search procedures and shower accommodations for their transgender inmate population. This PREA auditor concluded that Barbara Ester Unit (BEU) was not in compliance with PREA Standard 115.42. Corrective Action was required.

During Barbara Ester Unit's (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and email correspondence with ARDOC's PREA Coordinator (PC) and BEU's Deputy Warden/PREA Compliance Manager (DW/PCM). The goal was to discuss the recommended corrective actions needed to meet compliance with this standard. After the meetings and email correspondence, BEU's Deputy Warden/PREA Compliance Manager shared that Wellpath Medical Team has assumed the responsibilities of conducting "*Transfer-In PREA Risk Screening*" in "*eOmis*" (real time) for all BEU intakes. Additionally, BEU's DW/PCM submitted a "*Memo*" to this auditor and an email from BEU's Human Resources Manager (both dated 9/15/25), as evidence of BEU completing the hiring of an "*Administrative I Staff*." This "*Administrative I Staff*" will assist BEU's current Classification staff with "*PREA Risk Screenings*" "*30-Day PREA Risk Screening Reassessments*," and "*Housing Decisions/Coordination*."

Furthermore, BEU's Deputy Warden/PREA Compliance Manager and Classification staff shared with this auditor how ARDOC's Randall L. Williams Correctional Facility Classification team makes decisions, based on their "*PREA Risk Screening*" results. They shared the once the PREA Screening is completed in the "*eOmis*" system, inmates who screen to be "victim-prone" and/or "high risk of perpetration/abusiveness" are automatically flagged in "*eOmis*." This then disallows those two categories of inmates to be housed in the same housing locations, unless a written explanatory override by a supervisory staff is completed and signed. This "*eOmis*" override then notifies the facility's Warden of the action taken. Additionally, BEU's Warden and DW/PCM shared that if the inmate is screened to be "high risk of perpetration/abusiveness," and not able to separate high risk inmates properly, BEU have the ability to move the inmate to another facility on the Pine Bluff Facilities complex (there are 3 facilities on the complex) and replaced more fitting screened inmate. Finally, other decisions considered by BEU's Classification team entail considering which housing area work, and education program to place the inmates, inmates, with the goal of keeping separate those inmates who screen to be "victim prone" inmates separate from those inmates who screen to be "high risk of abusiveness."

Finally, BEU's Deputy Warden/PREA Compliance Manager (DW/PCM) shared with this auditor that "*Opposite Gender Viewing and Searching*" and "*Professionalism with LGBTI Offenders*" trainings has been added to their "*Pre-Service*" and "*Annual In-*

	<p><i>Service</i>” trainings. BEU’s DW/PCM submitted attendance/sign in sheets to their “<i>PREA Annual Review</i>” training (dated 3/10/25, 3/11/25, 3/13/25, and 3/17/25). The combined dated sign-in sheets had 77 staff attendance signatures. This auditor also received the “<i>Professionalism with LGBTI Offenders</i>” PPT curriculum, as well as the “<i>Arkansas Department of Corrections PREA Training for Staff</i>” refresher training PPT curriculum (34 slides).</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.42.</p>
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115.43	Protective Custody
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.43. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.43. An excerpt states, “<i>Victims of Sexual Abuse or those at high risk for abuse shall not be placed in involuntary protective custody or segregation unless all available alternatives have been assessed and documented and are not available. The facility may only hold the Offender for twenty-four (24) hours in involuntary segregation while completing the assessment, and if the placement has to continue, must document why there are no other available alternatives and provide access to programs, education, work, and other privileges to the extent possible.</i>”</p> <p>This auditor reviewed “ARDOC’s Secretarial Directive (2024-02),” concluding that it has the necessary language to align with PREA Standard 115.43.</p> <p>While on site, this auditor interviewed BEU’s Superintendent, 2 Captains and 1 Major. All individually and consistently shared that involuntary protective custody/restricted housing is not used for inmates who screens to be at risk of sexual victimization. Additionally, they shared that inmates are placed in barracks that are classified to have lower institutional risk or transferred to another facility (if necessary). This auditor also interviewed 32 randomly selected inmates. Each inmate shared that BEU does not place them in protective custody or restricted housing based on the outcome of the “<i>PREA Risk Screening.</i>”</p> <p>Furthermore, during this auditor’s site review/tour, this auditor informally interviewed a random selection of 2 inmates in restrictive housing at BEU. Each individually shared that they were not placed in restricted housing/segregation because of the outcome of their “<i>PREA Risk Screening</i>” results. Finally, this auditor conducted an</p>

	<p>exhaustive site review/tour and confirmed that their restricted housing is utilized only for disciplinary behavior sanctions.</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.43.</p>
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115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.51. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.51. An excerpt states, <i>“Offenders may report Sexual Abuse and Sexual Harassment, Retaliation by other Offenders or Staff, and Staff neglect or violation of responsibilities that may have contributed to such incidents through multiple avenues:</i></p> <ul style="list-style-type: none"> <i>a. Calling the DOC PREA Hotline free of charge using the Offender telephone system;</i> <i>b. Telling any Staff member;</i> <i>c. Writing a note or request to any Staff member;</i> <i>d. Sending correspondence to the PREA Coordinator;</i> <i>e. Sending correspondence to the designated external agency;</i> <i>f. Sending confidential correspondence to a designated community-based victim advocacy group. Such correspondence will be treated as legal mail;</i> <i>g. Utilizing the Offender Grievance Procedure; or</i> <i>h. Having a family member or friend make a report to the Warden or DOC PREA Coordinator.</i> <p><i>An Offender may report a sexual offense to any Staff member and may also report using any of the listed multiple internal and external reporting methods, whether verbally, in writing, anonymously, or via a third party.”</i></p> <p>This auditor reviewed “ARDOC’s Secretarial Directive (2024-02),” concluding that it has the necessary language to align with PREA Standard 115.51.</p>

Additionally, while onsite, this PREA auditor interviewed a random selection of 32 BEU inmates asking, *“Please share with me at least four different ways an inmate can report an incident of sexual abuse or sexual harassment here at BEU?”* There were 9 of 32 who shared 4 various ways, 14 out of 32 could share 3 various ways to report and 8 out of 32 reported fewer than 2 ways to report. Many of the 32 total inmates interviewed stated different staff names to report versus various reporting avenues/ways to report at BEU. When this auditor asked the 32 interviewees about an external way for an inmate to report and anonymously, 1 out of the 32 reported they could report to the Arkansas *“Commission on Law Enforcement Standards and Training (CLEST).”*

This auditor also reviewed ARDOC’s Memorandum of Understanding (MOU) with Arkansas *“Commission on Law Enforcement Standards and Training” (CLEST)*. CLEST is ARDOC’s external reporting entity, who receives inmate and inmate reports of sexual abuse. CLEST receives mail-in reports then immediately forwards all reports to ARDOC’s PREA Coordinator. This auditor reached out to CLEST and spoke to a representative, who verified the MOU, as well as CLEST’s responsibilities to receive and immediately forward reports of sexual abuse by an ARDOC inmate of inmate.

When this auditor conducted an exhaustive site review/site review/tour, this auditor observed that the PREA reporting signage throughout the facility was in English and Spanish. This auditor did observe BEU’s CLEST reporting signage on the walls, however some CLEST signage was placed in places not near the inmates’ telephones or near other PREA Reporting signage.

This auditor recommended that BEU post CLEST signage near all inmate telephones in both Spanish and English and that photo evidence be placed in OAS. Additionally, this auditor recommended that all current BEU inmates receive in-person *“Refresher Education”* which should consist of showing the updated PREA video, followed by education on BEU’s zero tolerance policy, inmates right to be free from sexual abuse and sexual harassment, ways to report, where to report, explaining BEU’s external reporting access through CLEST, who the victim advocates are at the facility, what happens after reporting a PREA incident, what to expect in the investigation process and retaliation monitoring. This PREA auditor concluded that Barbara Ester Unit (BEU) was not in compliance with PREA Standard 115.51. Corrective Action was required.

During Barbara Ester Unit’s (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and email correspondence with ARDOC’s PREA Coordinator (PC) and BEU’s Deputy Warden/PREA Compliance Manager (DW/PCM). The goal was to discuss the recommended corrective actions needed to meet compliance with this standard. After the meetings and email correspondence, BEU’s Deputy Warden/PREA Compliance Manager submitted photo evidence of CLEST signage posted by each telephone in all inmate barracks. Also, this auditor requested to see the PREA Orientation and PREA Comprehensive Education of 26 randomly selected BEU inmates. BEU’s Deputy Warden/PREA Compliance Manager (DW/PCM) submitted 26 initialed, acknowledged, and signed BEU *“PREA Education Acknowledgements”* (BEU’s inmate PREA orientation acknowledgements at intake) and 26 initialed, acknowledged and signed *“PREA Offender Education Checklist”*

	<p>(PREA Inmate Comprehensive Education), as evidence of providing “<i>PREA Refresher Education</i>” to BEU’s inmates. BEU’s “<i>PREA Offender Education Checklist</i>” entailed education on BEU’s zero tolerance policy, inmates rights to be free from sexual abuse and harassment, multiple ways to report at BEU, external reporting through Arkansas <i>Commission on Law Enforcement Standards and Training (CLEST)</i>, Grievance reporting, 3rd Party Reporting, PREA allegations will be investigated, as well as victim advocacy education and available access through specialized trained staff victim advocates.</p> <p>Additionally, BEU’s DW/PCM submitted an example of a full “<i>PREA Inmate Orientation Packet</i>,” and an example of a full “<i>PREA Comprehensive Education Packet</i>,” as evidence of revisions to the PREA Orientation (at intake) and PREA Comprehensive Education process (within 30 days of arrival). Finally, BEU submitted their updated PREA “<i>End the Silence</i>” pamphlet (English and Spanish versions) which has been personalized to BEU. This pamphlet’s contained all the inmate education shared within the “<i>PREA Offender Education Checklist</i>,” as well as the names of BEU’s victim advocates and their availability for emotional support on its front page and within its contents.</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.51.</p>
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115.52	Exhaustion of administrative remedies
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.52. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.52. An excerpt states, “<i>Offenders may report Sexual Abuse and Sexual Harassment, Retaliation by other Offenders or Staff, and Staff neglect or violation of responsibilities that may have contributed to such incidents through multiple avenues:</i></p> <ul style="list-style-type: none"> <i>a. Calling the DOC PREA Hotline free of charge using the Offender telephone system;</i> <i>b. Telling any Staff member;</i> <i>c. Writing a note or request to any Staff member;</i> <i>d. Sending correspondence to the PREA Coordinator;</i>

e. *Sending correspondence to the designated external agency;*

f. *Sending confidential correspondence to a designated community-based victim advocacy group. Such correspondence will be treated as legal mail;*

g. *Utilizing the Offender Grievance Procedure; or*

h. *Having a family member or friend make a report to the Warden or DOC PREA Coordinator.*

An Offender may report a sexual offense to any Staff member and may also report using any of the listed multiple internal and external reporting methods, whether verbally, in writing, anonymously, or via a third party."

This auditor reviewed "ARDOC's Secretarial Directive (2024-02)" and has concluded that it has the necessary language to align with PREA Standard 115.52.

While onsite, this auditor interviewed BEU's Grievance Officer, who shared that she checks the grievance box daily. She further shared that she is the only BEU personnel (civilian) who has access to the "Grievance Box." If a PREA related grievance is received, it is responded to immediately as opposed to going through a "problem solver" and the steps to address the inmate's concern as a part of their normal grievance process. This auditor observed two "Grievance Boxes" in two central locations. This auditor placed a grievance request in the box to observe the time required to respond to an inmate grievance request. The Grievance Officer called promptly the same day stating receipt of the grievance. During interviews with direct care staff, only 3 out of 10 knew that a grievance is a PREA reporting avenue for inmates. Staff needed clarity regarding how to handle a PREA emergency grievance.

Additionally, while onsite, this PREA auditor interviewed a random selection of 32 BEU inmates asking, "Please share with me at least four different ways an inmate can report an incident of sexual abuse or sexual harassment here at BEU?" There were 9 of 32 who shared 4 various ways, 14 out of 32 could share 3 various ways to report and 8 out of 32 reported fewer than 2 ways to report. Many of the 32 total inmates interviewed stated different staff names to report versus various reporting avenues/ways to report at BEU. When this auditor asked the 32 interviewees the purpose of the "Grievance Box," each inmate shared that the "Grievance Box" is a 2-step informal and formal process for inmates and staff to remedy unfair treatment. There were only 3 out of the 32 inmates shared that the "Grievance Box" was an avenue to report PREA incidents.

This auditor recommended BEU provide "Refresher Education" to all inmates focused on the purpose of grievances, reporting PREA grievances, the process of reporting PREA grievances, how to access grievances, who is responsible for retrieving grievances, and that PREA grievances are handled as emergency grievances and are immediately investigated upon receipt. This auditor also recommended that the staff receive "Refresher Training" on the process of handling a PREA grievance and that PREA grievances are handled as emergency grievances and don't follow to same timeline as the normal grievance process and are immediately investigated upon

receipt. This should be documented through staff signatures and uploaded into OAS. This PREA auditor concluded that Barbara Ester Unit (BEU) was not in compliance with PREA Standard 115.52. Corrective Action was required.

During Barbara Ester Unit's (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and email correspondence with ARDOC's PREA Coordinator (PC) and BEU's Deputy Warden/PREA Compliance Manager (DW/PCM). The goal was to discuss the recommended corrective actions needed to meet compliance with this standard. After the meetings and email correspondence, this auditor requested to see the PREA Orientation and PREA Comprehensive Education of 26 randomly selected BEU inmates. BEU's Deputy Warden/PREA Compliance Manager (DW/PCM) submitted 26 signed BEU "PREA Education Acknowledgements" and 26 initialed, acknowledged and signed "PREA Offender Education Checklist," as evidence of providing "PREA Refresher Education" to BEU's inmates. BEU's "PREA Offender Education Checklist" entailed education on BEU's zero tolerance policy, inmates rights to be free from sexual abuse and harassment, multiple ways to report at BEU, external reporting through Arkansas Commission on Law Enforcement Standards and Training (CLEST), Grievance reporting, 3rd Party Reporting, PREA allegations will be investigated, as well as victim advocacy education and available access through specialized trained staff victim advocates.

Additionally, BEU's DW/PCM submitted an example of a full "PREA Inmate Orientation Packet," and an example of a full "PREA Comprehensive Education Packet," as evidence of revisions to the PREA Orientation (at intake) and PREA Comprehensive Education process (within 30 days of arrival). Finally, BEU submitted their updated PREA "End the Silence" pamphlet (English and Spanish versions) which has been personalized to BEU. This pamphlet's contained all the inmate education shared within the "PREA Offender Education Checklist," as well as PREA grievances and their immediate investigation within its contents.

Finally, BEU's DW/PCM submitted BEU's "Shift Briefing" discussion topics and attendance rosters (from 9/9/25 through 9/15/25), as evidence of "Staff Training" on BEU's grievance process related to PREA grievances. Other discussion points were PREA grievances can be initiated anytime, inmates can request additional paper for PREA grievances, and PREA grievances will be investigated immediately. BEU's PREA grievances refresher discussions occurred daily for 7 days during "Shift Briefings" to ensure that all staff shifts and schedules receive the information. If specific staff were absent on one day, the information would still be available and discussed on their following days during "Shift Briefings."

This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.52.

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard

Auditor Discussion

This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center's Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.53. Barbara Ester Unit (BEU) submitted their "Arkansas Department of Corrections PREA Secretarial Directive (2024-02)" as evidence of compliance with PREA Standard 115.53. An excerpt states, "*Victim Advocacy Training - Employees designated to provide victim advocacy for Offenders when a community-based organization is not available must receive approved training as indicated for Victim advocates.*"

This auditor reviewed "ARDOC's Secretarial Directive (2024-02)" and has concluded that it has the necessary language to align with PREA Standard 115.53.

This auditor also reviewed ARDOC's Coordinated Response Plan which states, "*If requested by the victim, a victim advocate, qualified agency staff member, or qualified community-based organization, a DOC staff member will accompany and support the victim through the forensic medical examination process and investigatory interviews. Their role is to provide emotional support, crisis intervention services, information, and referrals. Please contact your facility PCM for a list of qualified agency staff members.*"

This auditor reviewed "ARDOC's Secretarial Directive (2024-02)" and "Coordinated Response Plan" concluding that they have the necessary language to align with PREA Standard 115.53.

While onsite, this auditor interviewed BEU's Chaplin, who shared that he received 4 hours specialized training through ARDOC's PREA Coordinator to be the staff victim advocate. He further shared that he would be the first line of contact for support and advocacy. This auditor reviewed the Victim Advocacy certificate as verification of training. ARDOC's PC submitted the "*Sexual Assault Victim Advocacy Training Acknowledge Forms*" via electronic files, as evidence of compliance with this 115.53 PREA Standard. This auditor also reviewed ARDOC's victim's advocate training PPT curriculum (50 slides), as well as accompanying supplemental individual/groups exercises and scenario exercises.

Additionally, while on site, this auditor interviewed a random selection of 32 BEU inmates. When this auditor asked about their knowledge of victim advocacy services provided for inmates at BEU, 0 out of the 32 inmates knew who BEU's Victim Advocates were, who provide advocacy for inmate victims of sexual abuse and emotional support for all BEU inmates.

This auditor recommended that BEU identify and provide specialized training for a minimum of 2 additional victim advocates in addition to BEU's Chaplin. This auditor also recommended that the victim advocates develop formal procedures if a Victim Advocate is needed. A victim advocate should know their responsibilities, what to do when called upon to serve in that capacity, and what the procedures are in the event

they are needed. This auditor also recommended that all BEU inmates receive *"Refresher Education"* focused on who the BEU victim advocates are at the facility, their role and purpose, and how to access them if needed. Inmates should be aware that BEU's specialized trained Victim Advocates provide victim advocacy and emotional support to all BEU inmates. This PREA auditor concluded that Barbara Ester Unit (BEU) was not in compliance with PREA Standard 115.53. Corrective Action was required.

During Barbara Ester Unit's (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and email correspondence with ARDOC's PREA Coordinator (PC) and BEU's Deputy Warden/PREA Compliance Manager (DW/PCM). The goal was to discuss the recommended corrective actions needed to meet compliance with this standard. After the meetings and email correspondence, Barbara Ester Unit's DW/PCM submitted the training transcripts of BEU's Chaplain and Training Officer as BEU's 2 specialized trained PREA Victim Advocates (training dated 3/20/25). BEU's DW/PCM also submitted photo evidence of a Victim Advocate informational/flyer posted on the wall in BEU's Inmate Library, Inmate Information Board by the Master Control Room, BEU's Main Hallway, and Main Hall-West End. Additionally, the informational/flyer has also been added to BEU's *"Inmate Morning Show's"* layout of information daily. BEU's *"Inmate Morning Show"* is a major avenue of disseminating and communicating information to all BEU inmates daily.

Finally, BEU's DW/PCM submitted BEU's *"Shift Briefings"* discussion notes and attendance roster (from 9/9/25 through 9/15/25), as evidence of *"Staff Training"* on who BEU's victim advocates are, their roles, and how to provide inmates access to BEU's victim advocates. Victim Advocate refresher discussions occurred daily for 7 days during *"Shift Briefings"* to ensure that all staff shifts and schedules receive the information. If specific staff were absent on one day, the information would still be available and discussed on their following days during *"Shift Briefings."*

This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.53.

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center's Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.54. Barbara Ester Unit (BEU) submitted their "Arkansas Department of Corrections PREA

Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.54. An excerpt states, “Offenders may report Sexual Abuse and Sexual Harassment, Retaliation by other Offenders or Staff, and Staff neglect or violation of responsibilities that may have contributed to such incidents through multiple avenues:

- a. Calling the DOC PREA Hotline free of charge using the Offender telephone system;
- b. Telling any Staff member;
- c. Writing a note or request to any Staff member;
- d. Sending correspondence to the PREA Coordinator;
- e. Sending correspondence to the designated external agency;
- f. Sending confidential correspondence to a designated community-based victim advocacy group. Such correspondence will be treated as legal mail;
- g. Utilizing the Offender Grievance Procedure; or
- h. Having a family member or friend make a report to the Warden or DOC PREA Coordinator.

An Offender may report a sexual offense to any Staff member and may also report using any of the listed multiple internal and external reporting methods, whether verbally, in writing, anonymously, or via a third party.”

This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and has concluded that it has the necessary language to align with PREA Standard 115.54.

This auditor also reviewed the third-party reporting option for contracted ARDOC facilities through the ARDOC’s website (Prison Rape Elimination Act (PREA) - Arkansas Department of Corrections) which states, “If you wish to report an alleged incident of sexual assault, sexual abuse, sexual misconduct or sexual harassment on behalf of an offender you may:

Report directly to the AR DOC facility where the offender is housed:

To find contact information for all AR DOC facilities, click the button below.

AR DOC Facilities

Report by mail:

DOC Headquarters Attn: PREA Coordinator
1302 Pike Ave., Suite C
North Little Rock, AR 72114

Report by phone:

Fill out the form below:

PREA Reporting Form...

This auditor submitted a "test third-party report" on ARDOC's website and the ARDOC's PREA Coordinator promptly reached out and responded to the report.

However, while on site, this auditor interviewed a random selection of 32 inmates, asking of ways a BEU inmate could report sexual abuse or sexual harassment. There were only 7 out of 32 who responded that they could report through a 3rd Party. This auditor also reviewed BEU's "*End the Silence*" PREA pamphlet, which provided information on ways to report sexual abuse/harassment through a third-party (legal, family, friend, trusting inmate).

This auditor recommended that BEU provide "*Refresher Education*" to all inmates, focused on 3rd party reporting, who are 3rd party reporters and how a 3rd party reporter could submit a PREA report on behalf of an inmate. This PREA auditor concludes that Barbara Ester Unit (BEU) is not in compliance with PREA Standard 115.54. Corrective Action is required.

During Barbara Ester Unit's (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and email correspondence with ARDOC's PREA Coordinator (PC) and BEU's Deputy Warden/PREA Compliance Manager (DW/PCM). The goal was to discuss the recommended corrective actions needed to meet compliance with this standard. After the meetings and email correspondence, this auditor requested to see the PREA Orientation and PREA Comprehensive Education of 26 randomly selected BEU inmates. BEU's Deputy Warden/PREA Compliance Manager (DW/PCM) submitted 26 signed BEU "*PREA Education Acknowledgements*" and 26 initialed, acknowledged and signed "*PREA Offender Education Checklist*," as evidence of providing "*PREA Refresher Education*" to BEU's inmates. BEU's "*PREA Offender Education Checklist*" entailed education on BEU's zero tolerance policy, inmates rights to be free from sexual abuse and harassment, multiple ways to report at BEU, external reporting through Arkansas *Commission on Law Enforcement Standards and Training* (CLEST), Grievance reporting, 3rd Party Reporting, PREA allegations will be investigated, as well as victim advocacy education and available access through specialized trained staff victim advocates.

Additionally, BEU's DW/PCM submitted an example of a full "*PREA Inmate Orientation Packet*," and an example of a full "*PREA Comprehensive Education Packet*," as evidence of revisions to the PREA Orientation (at intake) and PREA Comprehensive Education process (within 30 days of arrival). Both highlight 3rd Party Reporting access. Finally, BEU submitted their updated PREA "*End the Silence*" pamphlet (English and Spanish versions) which has been personalized to BEU. This pamphlet's contained all the inmate education shared within the "*PREA Offender Education Checklist*," as well as PREA grievances and their immediate investigation within its contents.

This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.54.

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	<p data-bbox="256 264 544 297">Auditor Discussion</p> <p data-bbox="256 338 1481 958">This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.61. Barbara Ester Unit (BEU) submitted their Arkansas Department of Correction’s Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.61. An excerpt states, <i>“Staff members shall immediately report all knowledge, suspicions, or information of an incident of a sexual offense within DOC or any other correctional facility. They shall also report any Retaliation against someone who has reported such an incident and any knowledge of Staff who neglect to report the above incidents or who, through neglect of duty or violation of responsibilities, may have contributed to an incident occurring. Staff can privately report Offender Sexual Abuse and Sexual Harassment directly to the warden or deputy warden of the facility, or by contacting the PREA Hotline.”</i></p> <p data-bbox="256 999 1481 1070">This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and concluded that it has the necessary language to align with PREA Standard 115.61.</p> <p data-bbox="256 1111 1481 1480">While onsite, this auditor also interviewed 27 randomly selected BEU specialized staff, direct supervision staff, volunteers, and contractors. Each knew their duty to immediately report if they are informed, suspects, receive information, or become aware of sexual abuse at BEU. Finally, this auditor interviewed 32 randomly selected inmates. Each interviewed inmate shared that staff immediately respond to reports of sexual abuse or sexual harassment. Finally, this auditor reviewed ARDOC’s website and Coordinated Response Plan, which provided information to inmates on ways to report sexual abuse/harassment through informing staff, third-party (legal, family member, friend), written reporting, and confidential reporting.</p> <p data-bbox="256 1520 1481 1592">This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.61.</p>

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	<p data-bbox="256 1877 544 1910">Auditor Discussion</p> <p data-bbox="256 1951 1481 2074">This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied</p>

	<p>upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.62. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.62. An excerpt states, <i>“If at any time it is learned that an Offender is subject to a substantial risk of imminent Sexual Abuse, immediate action shall be taken to protect the Offender.”</i></p> <p>This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and has concluded that it has the necessary language to align with PREA Standard 115.62.</p> <p>While onsite, this auditor also interviewed 27 randomly selected BEU specialized staff, direct supervision staff, volunteers and contractors, asking the question, <i>“If you learn that an inmate may be at imminent risk of sexual abuse, what steps would you take to protect?”</i> There was a consensus amongst the interviewed staff that they would immediately attempt to mitigate the risk by informing supervisory staff/BEU’s PREA Compliance Manager, recommending changing barrack assignments or programming adjustments. Finally, this auditor interviewed 32 randomly selected inmates. Each interviewed inmate shared that staff protect vulnerable inmates and they immediately respond to any reports of inmate risk of sexual abuse or sexual harassment.</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.62.</p>
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115.63	Reporting to other confinement facilities
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.63. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.63. An excerpt states, <i>“Within seventy-two (72) hours of receiving an allegation that an Offender was sexually abused while confined at another facility, the Warden shall notify the head of the facility where the incident occurred.</i></p> <p><i>The notification shall be documented. All allegations received from other facilities shall be investigated in accordance with the PREA Standards. The incident report and investigation shall be completed by the facility where the incident occurred.”</i></p> <p>This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and has concluded</p>

that it has the necessary language to align with PREA Standard 115.63.

While on site, this auditor interviewed BEU’s Superintendent and asked if BEU received any reports from inmates within the last 12 months. He shared that BEU had not received any report from their inmates of sexual abuse from any previous facilities. BEU’s Superintendent shared the procedures regarding their reporting process if a report of sexual abuse came from an inmate regarding another facility and that BEU’s specialized trained PREA Investigators will provide support to the previous facility investigators throughout the investigation if such a report was received. BEU’s Superintendent demonstrated understanding of the process. This auditor discussed the timeline if a BEU inmate reports sexual abuse that occurred at a previous facility and that BEU is responsible to provide a written notice to the facility within 72 hours by either himself or the designee.

BEU submitted a fillable template memo that ARDOC utilizes to “*Report to Other Confinement Facility*” in OAS as evidence of compliance. This template memo aligns with PREA Standard 115.63. This memo can be used by BEU’s Superintendent and to inform other confinement facility heads of sexual abuse incidents which occurred at a previous confinement facility and was reported by a BEU inmate. Finally, this auditor interviewed 32 randomly selected inmates. Each interviewed inmate shared they have not reported or have been informed by another inmate that they were a victim of unreported sexual abuse at a previous facility.

This PREA auditor concludes that the Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.63.

115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	<p data-bbox="256 1406 544 1440">Auditor Discussion</p> <p data-bbox="256 1480 1481 1933">This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.64. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.64. An excerpt states, “<i>Upon learning that an Offender was sexually abused, the Staff member shall immediately ensure the safety of the Victim while reporting the information to the shift supervisor. The shift supervisor shall activate the Coordinated Response Plan and ensure the following steps have been taken:</i></p> <ul style="list-style-type: none"> <li data-bbox="347 1973 1023 2007">a. <i>The separation of the Victim and Perpetrator.</i> <li data-bbox="347 2045 1474 2078">b. <i>The security and protection of any crime scene to keep potential evidence in</i>

place for examination and investigation.

i. The only persons permitted to enter a secured crime scene shall be Arkansas State Police, the assigned investigator, or medical Staff as needed.

ii. The area shall remain secured as a crime scene until verification of a completed investigation and released by the investigating authority.

c. If the abuse occurred within the previous ninety-six (96) hours, request that the Victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, drinking, or eating;

d. If the abuse occurred within the previous ninety-six (96) hours, ensure that the Perpetrator does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, drinking, or eating;

e. The PREA checklist will be initiated immediately by the First Responder.”

This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and has concluded that it has the necessary language to align with PREA Standard 115.64.

While onsite, this auditor interviewed a random selection of 10 BEU security supervision staff. This auditor shared a scenario with each direct supervision staff. This auditor shared a scenario of a sexual assault occurring in the shower area, the victim immediately runs out and reports the assault to the direct supervision staff. Eight out of 10 knew their responsibilities if they were first to be informed, notified, or observe sexual abuse/sexual harassment of an inmate. Eight out of 10 interviewed security supervision staff were able to share their duties to preserve the potential crime scene to preserve usable evidence without this auditor’s prompting. Two out of 10 required this auditor’s prompting when discussing first responder duties as well as crime scene preservation in terms of requesting inmates not to change clothing, use the toilet, or shower. Finally, this auditor reviewed BEU’s training curriculum, which contained all the first responder duty deliverables within its information.

This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.64.

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied

	<p>upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.65. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections Coordinated Response Plan (24 pages)” as evidence of compliance with PREA Standard 115.65. The coordinated response spells out each ARDOC staff, contractor, community hospital and related agency’s roles in responding to ARDOC inmate sexual abuse. An excerpt states, “Updates to the PREA Coordinated Response Plan must be approved by the DOC PREA Coordinator. Any revisions not approved by the DOC PREA Coordinator will be violating Secretarial Directive 2024-02. For update inquiries, please email DOCPREASUPERVISOR@doc.arkansas.gov.”</p> <p>This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and has concluded that it has the necessary language to align with PREA Standard 115.65.</p> <p>While onsite, this auditor interviewed 11 specialized staff (medical, mental health, facility supervisory, PREA Compliance Manager, Investigators, etc.) and asked their coordinated responsibilities if an inmate is sexually abused while they are on duty (not the 1st Responder) and an active sexual abuse incident occurred. Each specialized staff and contractor staff knew their coordinated responsibilities.</p> <p>While onsite, this auditor interviewed a random selection of 10 BEU security supervision staff. This auditor shared a scenario with each direct supervision staff. This auditor shared a scenario of a sexual assault occurring in the shower area, the victim immediately runs out and reports the assault to the direct supervision staff. Eight out of 10 knew their responsibilities if they were first to be informed, notified, or observe sexual abuse/sexual harassment of an inmate. Eight out of 10 interviewed security supervision staff were able to share their duties to preserve the potential crime scene to preserve usable evidence without this auditor’s prompting. Two out of the 10 required light prompting when discussing crime scene preservation in terms of requesting inmates not to change clothing, use the toilet, or shower. Finally, this auditor reviewed BEU’s training curriculum, which contained all the first responder duty deliverables within its information.</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.65.</p>
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115.66	Preservation of ability to protect inmates from contact with abusers
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied</p>

	<p>upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.66.</p> <p>This PREA Auditor did not receive any pre-audit documents by Barbara Ester Unit (BEU), to be reviewed to determine compliance with Standard 115.66. This PREA Auditor interviewed ARDOC Secretary (Agency Head), ARDOC Chief of Staff (Designee), ARDOC's PREA Coordinator and the Superintendent of BEU. Each individually affirmed that Arkansas is not a union state, and ARDOC is not a union agency. They further shared that ARDOC and BEU have not engaged in collective bargaining on their agency's behalf or renewed any collective bargaining agreement or other agreement. Additionally, during this auditor's interview with 10 randomly selected specialized and 10 direct supervision staff members, they were asked if they were union employees and all employees stated that they were non-union employees.</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.66.</p>
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115.67 Agency protection against retaliation	
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center's Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.67. Barbara Ester Unit (BEU) submitted their "Arkansas Department of Corrections PREA Secretarial Directive (2024-02)" as evidence of compliance with PREA Standard 115.67. An excerpt states, "<i>Retaliation by or against any Staff, Offender, or witness involved in a complaint or report of Sexual Abuse or Sexual Harassment is strictly prohibited. Retaliation, in and of itself, shall be investigated and may constitute grounds for disciplinary action.</i>"</p> <ol style="list-style-type: none"> 1. <i>The PCM at each facility shall be responsible for monitoring Retaliation.</i> 2. <i>Monitoring shall occur for at least ninety (90) days following an allegation of Sexual Abuse or Sexual Harassment. Monitoring shall occur beyond ninety (90) days if the initial monitoring indicates a continuing need. Monitoring shall cease if the investigation determines that the allegation is Unfounded.</i> 3. <i>When monitoring Offenders, periodic status checks shall be conducted by the PCM as needed, but at least once every thirty (30) days. Status checks shall be conducted more often if concerns are expressed by the Offender.</i> 4. <i>Emotional support services shall be provided as well as appropriate measures</i>

taken to protect any individual who expresses a fear of Retaliation."

This auditor reviewed "ARDOC's Secretarial Directive (2024-02)" and concluded that it has the necessary language to align with PREA Standard 115.67.

While on site, this auditor interviewed 3 BEU Administrative PREA Investigators, who are designated to conduct PREA investigations. Each interviewed investigator knew their responsibilities regarding evidence collection, Miranda/Garrity rights, interviewing procedures, retaliation monitoring, and report-writing protocols, and evidentiary standards for administrative PREA investigations. This auditor requested a random selection of five PREA Investigator's Specialized Training through ARDOC's "Sexual Abuse Investigations Training (SAIT)." They were all present and verified.

This auditor also interviewed ARDOC's PREA Coordinator (PC), who shared that each facility's PREA Compliance Manager (PCM) is primarily responsible for completing and documenting initial, 30-, 60-, and 90-day retaliation monitoring in ARDOC's "eOmis" (electronic offender management information system). However, PCM can assign retaliation monitoring to another BEU site staff. ARDOC's PC further shared that she sends email reminders (with 30, 60, or 90 retaliation monitoring forms attached) to all PCMs at the commencement of the investigation.

This auditor requested completed investigations within the past 12 months, to gain insight into BEU's PREA Investigator reporting style and investigation content. This auditor reviewed 5 randomly selected PREA investigations (2 Sexual Harassment and 3 Sexual Abuse). While reviewing each selected completed investigation packet, this auditor identified that 3 of 3 sexual abuse investigation files had "Initial Retaliation Monitoring" completed/documented. Retaliation Monitoring included: documented initial retaliation monitoring check, face-to-face check-ins (with inmate signature), documentation of program reviews, and disciplinary report reviews. The alleged victims and alleged perpetrators were asked if they wanted to speak to mental health.

Finally, this auditor interviewed 32 randomly selected BEU inmates asking, "Have you reported or has there been any reports of sexual abuse of sexual harassment at BEU since you've been here?" All inmates stated that they had not reported sexual abuse while at BEU.

This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.67.

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center's Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.68. Barbara Ester Unit (BEU) submitted their "Arkansas Department of Corrections PREA Secretarial Directive (2024-02)" and #3A-18 as evidence of compliance with PREA Standard 115.68. An excerpt states, "*Victims of Sexual Abuse or those at high risk for abuse shall not be placed in involuntary protective custody or segregation unless all available alternatives have been assessed and documented and are not available. The facility may only hold the Offender for twenty-four (24) hours in involuntary segregation while completing the assessment, and if the placement has to continue, must document why there are no other available alternatives and provide access to programs, education, work, and other privileges to the extent possible.*"

This auditor reviewed "ARDOC's Secretarial Directive (2024-02)" and concluded that it has the necessary language to align with PREA Standard 115.68.

While on site, this auditor interviewed BEU's Superintendent, 3 Investigators and 1 Captain. During these interviews, there was a consensus that if an inmate reported sexual abuse, that according to BEU's coordinated response would be to separate the victim and perpetrator and place both in restrictive housing until the conclusion of the investigation. This auditor stated that inmate victims should not be involuntarily placed in restrictive housing until the conclusion of an investigation as it may retraumatize the victim. Another option could include placing the alleged victim in alternative housing.

During this auditor's site review/tour, this auditor informally interviewed a random selection of 3 inmates in restrictive housing at BEU. Each individually shared that they were not placed in restricted housing/segregation because of reporting a "PREA Incident." Finally, this auditor conducted an exhaustive site review/tour and confirmed that their restricted housing is mainly utilized for disciplinary behavior sanctions.

This auditor recommended that BEU immediately cease placing victims who report sexual abuse into Restrictive Housing Unit/Segregation and find other non-segregated options to protect the victim inmate from retaliation and traumatization. This auditor also recommended BEU establish a consistency in practice with this standard before compliance can be determined. This PREA auditor concluded that Barbara Ester Unit (BEU) was not in compliance with PREA Standard 115.68. Corrective Action was required.

During Barbara Ester Unit's (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and email correspondence with ARDOC's PREA Coordinator (PC) and BEU's Deputy Warden/PREA Compliance Manager (DW/PCM). The goal was to discuss the recommended corrective actions needed to meet compliance with this standard. After the meetings and email correspondence, Pine Bluff Complex's Warden shared that the language in the "*Restrictive Housing Placement Form*" is outdated and not used by ARDOC or the

BEU. ARDOC's PREA Coordinator confirmed this response by Pine Bluff's Complex Warden. Additionally, BEU's Deputy Warden/PREA Compliance Manager submitted a "MEMO Directive" to all Barbara Ester Unit Staff affirming that segregated housing/ Restrictive Housing Unit is and will not be utilized for victim inmates that report sexual abuse. The "MEMO Directive" (dated 9/7/25) states,

TO: Barbara Ester Unit Staff

FROM: Deputy Warden/PREA Compliance Manager

REF: Restrictive Housing Placement for PREA Victims

DATE: 9/4/25

"PREA victims are not housed in Restrictive Housing. If an inmate needs to be moved to another barracks, due to the incident for safety reasons, contact the PREA Compliance Manager, Duty Warden, Chief of Security, or Classification staff, so arrangements can be made for the victim's placement.

The only exception to this is if the inmate requests to be housed in Restrictive Housing. If the inmate request to be placed in Restrictive Housing it needs to be documented by staff.

If you have any questions about these instructions, let me know.

Signed: BEU's Deputy Warden/PREA Compliance Manager"

This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.68.

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center's Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.71. Barbara Ester Unit (BEU) submitted their "Arkansas Department of Corrections PREA Secretarial Directive (2024-02)" as evidence of compliance with PREA Standard 115.71. An excerpt states, "All allegations of Sexual Abuse and Sexual Harassment shall be promptly, thoroughly, and objectively investigated, including third-party and anonymous reports. A PREA investigation shall be initiated within twenty-four (24) hours of the incident upon report to the facility or DOC investigator or as soon as possible if referred for investigation to the Arkansas State Police (ASP). ASP shall be</p>

notified once the quality of evidence appears to support criminal prosecution.

Investigations shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, the review of prior complaints and reports of Sexual Abuse involving the suspected Perpetrator, and investigative facts and findings. All investigations shall be consistent with the most updated version of the Coordinated Response Plan."

This auditor reviewed "ARDOC's Secretarial Directive (2024-02)" and concluded that it has the necessary language to align with PREA Standard 115.71.

While onsite, this auditor also interviewed 3 BEU Administrative PREA Investigators. This auditor shared a scenario of an inmate being sexually assaulted in the shower, and asked, "What is the PREA Investigator's coordinated responsibilities?" All investigators knew their responsibilities of evidence collection, Miranda/Garrity rights, interviewing procedures, understanding victim trauma, and investigation report-writing protocols. Both investigators identified the specialized training they received regarding investigating sexual abuse in confinement facilities. This auditor reviewed all interviewed PREA investigator's training transcript submitted by ARDOC's PREA Coordinator. These training transcripts verified the specialized training that the ARDOC PREA investigators received training through ARDOC's 3-day "Sexual Assault Investigation's Training."

This auditor requested to see a random selection of completed PREA Administrative Investigations within the last 12 months. This auditor reviewed 5 PREA investigations from the past 12 months at BEU (3 Sexual Abuse; 2 Sexual Harassment). This auditor reviewed BEU's PREA Investigator reporting style and investigation content. The reviewed investigation files submitted were complete. The content within the file had a structured order to conduct a proper review. The investigation reports had a summary of the investigation provided, along with a PREA investigation outcomes "Cover Sheet" (which ARDOC uses to share the outcomes of the PREA Administrative Investigation) to identify the preponderance of evidence determination/outcome (unsubstantiated, substantiated, or unfounded). One file did not have a preponderance of evidence determination therein.

This PREA auditor also reviewed ARDOC's "Coordinated Response Plan," which discusses the conduct of Administrative PREA Investigations. Excerpts from ARDOC's "Coordinated Response Plan" ARDOC's "Coordinated Response Plan," states,

"INVESTIGATIONS:

PREA Investigator:

The PREA investigator shall follow the following process to investigate allegations of sexual abuse:

1) Initiate the PREA investigation process within 24 hours or as circumstances dictate.

a. Gather and preserve physical and DNA evidence and available electronic monitoring data.

b. Interview victims, perpetrators, and witnesses.

i. Ask the victim if they would like a victim advocate or qualified staff member to provide emotional support PRIOR to interviewing.

c. Review prior complaints and reports of sexual abuse involving the suspected perpetrator.

d. Assess the credibility of victims, perpetrators, and witnesses on an individual basis and not by the person's status as adult in custody or staff.

2) Investigative report must include the following:

a. Description of the physical and testimonial evidence

b. Reasoning behind credibility assessment

c. Investigative facts and findings

3) Ensure all reports, evidence, and documentation are uploaded to eOMIS and referred to the PREA compliance manager at the completion of the investigation.

PREA Compliance Manager:

Upon notification of an incident of sexual abuse, the PREA Compliance Manager shall complete the following duties:

1) Correspond with a victim advocate or qualified advocate if the victim would like emotional support during the investigative process.

2) Ensure the investigator assigned has completed Sexual Abuse Investigation Training (SAIT).

3) In allegations of sexual abuse by staff, contractor, or volunteer, consult the allegation with Warden to determine a course of action.

a. Separation of perpetrator from the victim.

i. Administrative leave

ii. Post reassignment Facility reassignment (if reasonable)

4) Monitor and provide technical resources to the PREA investigator.

5) Initiate retaliation monitoring ("Retaliation Assessment Form").

6) Review all documentation included in the investigative packet and refer the incident to the warden for further review.

Warden:

Upon notification of an alleged incident of sexual abuse, the warden shall:

1) *Ensure separation between the victim and perpetrator.*

2) *Forward all sexual abuse investigations to Internal Affairs for review and further investigation.*

PREA Coordinator:

Upon notification of an incident of sexual abuse, the PREA Coordinator shall complete the following duties:

1) *Review investigative packet to ensure compliance with policy and standards.*

2) *Ensure all information in eOMIS is input accurately.*

An additional excerpt from ARDOC's Secretarial Directive (2024-02) states, *"All PREA investigations shall be referred to the PCM, PREA Coordinator, and Warden or their designee for review and approval upon completion. Once approved by the Warden or designee, they shall be referred to Internal Affairs for final review... The Victim shall be informed within thirty (30) days of the conclusion of the investigation."*

Currently, All PREA Investigations are investigated by an assigned Facility PREA Investigator (not concluded), then referred to the Facility's Warden for review, then referred to ARDOC's PREA Coordinator for additional review, then referred to ARDOC's Internal Affairs for further investigation and final determination. This auditor interviewed ARDOC's Internal Affairs Division (IAD) Manager, who shared that they are responsible for reviewing and further investigating all PREA allegation, reports, or incidents of sexual abuse and sexual harassment. ARDOC's Internal Affairs further shared that they are often overwhelmed/swamped with traveling to various ARDOC facilities for further review, interviews, and conducting stress tests for sexual abuse and sexual harassment investigations. ARDOC's Internal Affairs Manager shared that when they provide a conclusion of the investigation, IAD submits their written determination to ARDOC's PC, who formulates an inmate notification (for sexual abuse) to be shared with the victim.

Furthermore, according to ARDOC's PREA Coordinator and ARDOC's Internal Affairs Division (IAD), PREA investigations at ARDOC facilities could last up to 60 days (or more) for administrative investigations. This auditor believes this is far too long for PREA administrative investigations. This auditor can understand this length of time for sexual abuse allegation, which is criminal and involves "Arkansas State Police" (ASP) investigations as well. Overall, this auditor correlates this long length of investigations with the multiple layers of review.

While on site, this auditor interviewed 3 BEU Administrative PREA Investigators, who are designated to conduct PREA investigations. Each interviewed investigator knew their responsibilities regarding evidence collection, Miranda/Garrity rights, interviewing procedures, retaliation monitoring, and report-writing protocols, and evidentiary standards for administrative PREA investigations. BEU's PCM also submitted copies of all three PREA Investigator's Specialized Training through ARDOC's *"Sexual Abuse Investigations Training" (SAIT)*.

During BEU's onsite PREA audit closeout debriefing meeting with ARDOC's PC, BEU's Superintendent, and BEU's Captains and Major, this auditor made some recommendations. This auditor recommended that BEU's assigned specialized trained PREA Administrative Investigator, be authorized to recommend a determination of the preponderance of evidence for PREA Administrative investigations. This auditor also recommended that completed non-criminal PREA Administrative Investigations should be, at most, reviewed by and finalized by ARDOC's PREA Coordinator (rather than go up to IAD for final review). This would allow for investigations final determinations to be concluded more rapidly and decrease any appearance of potential bias reviews by the facility's PCM or Warden. Furthermore, this auditor recommended that ARDOC's Internal Affairs solely be involved in criminal related PREA investigations. Administrative PREA Investigations, related to policy breach, staff action/inactions, and/or non-criminal/facility level sexual harassments investigations, should be reviewed/finalized by ARDOC's PC. ARDOC's PC should then submit the investigation's final determination cover letter back to the facility's Warden and facility PCM, along with the *"Notice of Investigation Status"* (for sexual abuse victim to sign and receive notification of outcome).

During this debriefing meeting, this auditor recommended ARDOC's Internal Affairs cease requiring inmates who allege sexual abuse to submit to internal affairs administered CVSA *"voice stress test"* (polygraph examination or other truth-telling devices) or be disciplined. Additionally, ARDOC's IAD should make it clear in their policy, procedures, and practices that inmates who allege sexual abuse are not required to take IAD's CVSA *"voice stress test."*

On 2/4/2025, ARDOC's PC submitted their revised "Arkansas Department of Corrections PREA Secretarial Directive (SD 2025-01)" as evidence of compliance with PREA Standard 115.71. The revised excerpt now states, *"All PREA investigations shall be referred to the PCM, PREA Coordinator, and Warden or their designee for review and approval upon completion. Once approved by the Warden or designee, they shall be referred to Internal Affairs for final review if there is a finding of potential criminal activity by the PREA coordinator."*

On 2/4/2025, ARDOC's PC also submitted their revised "Arkansas Department of Corrections Internal Affairs Secretarial Directive (SD 2025-02)" as evidence of compliance with PREA Standard 115.71. The revised excerpt now states, *"All incidents (excluding incidents involving PREA investigations) as defined in Administrative Rule 005, or a Department Policy, will be investigated, or reviewed by the Internal Affairs Division, which will report directly to the Secretary of Corrections... All incidents involving PREA investigations shall be reviewed in accordance with the procedures dictated in the current PREA Secretarial Directive."*

Finally, this auditor recommended that BEU establish a period of consistent practice of following/adhering to the above-mentioned revised Secretarial Directives (SD 2025-01 & SD 2025-02) for investigations, as well as its procedures, before a determination of compliance can be concluded. This PREA auditor concluded that Barbara Ester Unit (BEU) was not in compliance with PREA Standard 115.71. Corrective Action was required.

	<p>During Barbara Ester Unit’s (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and email correspondence with ARDOC’s PREA Coordinator (PC) and BEU’s Deputy Warden/PREA Compliance Manager (DW/PCM). The goal was to discuss the recommended corrective actions needed to meet compliance with this standard. After the meetings and email correspondence, this auditor requested to review 8 randomly selected completed PREA investigations which occurred during this Corrective Action Period (CAP).</p> <p>ARDOC’s PREA Coordinator submitted the 8 requested PREA Investigations which occurred during this Corrective Action Period (3 SA and 5 SH PREA investigations) (1 substantiated staff on inmate sexual harassment; 2 unsubstantiated inmate on inmate sexual harassment; 1 unfounded staff on inmate sexual abuse, 2 unfounded inmate on inmate sexual abuse, and 2 substantiated inmate on inmate sexual harassment). Each investigation file submitted was neatly organized, structured, and had detailed and robust content from initial incidents and interviews to evidence identification. Furthermore, the investigation reports had a detailed summary of the investigation and ARDOC’s PREA investigation outcomes <i>“PREA Investigation Determination Cover Sheet”</i> (which shares the preponderance of evidence outcomes of the PREA Administrative Investigation as either being <i>“unsubstantiated,” “substantiated,”</i> or <i>“unfounded”</i>). The 3 unfounded sexual abuse investigations had signed/completed <i>“Notice of PREA Investigation Status”</i> (inmate notification). There were 0 unsubstantiated/substantiated sexual abuse investigations. BEU <i>“Sexual Abuse Incident Review”</i> team meetings were not required.</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.71.</p>
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115.72	Evidentiary standard for administrative investigations
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.72. Barbara Ester Unit (BEU) submitted their <i>“Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” #1A-27</i> as evidence of compliance with PREA Standard 115.72. An excerpt states, <i>“No standard higher than a preponderance of the evidence shall be imposed in determining whether allegations of Sexual Abuse or Sexual Harassment are Substantiated for administrative investigations.”</i></p> <p>This auditor reviewed <i>“ARDOC’s Secretarial Directive (2024-02)”</i> and concluded that it has the necessary language to align with PREA Standard 115.72.</p>

This PREA auditor also reviewed ARDOC's *"Coordinated Response Plan,"* which is a written prescription of the actions and conduct of all ARDOC facility level and agency level staff involved in incidents of sexual abuse and sexual harassment (amongst staff first responders, medical and mental health practitioners, investigators, and facility leadership). Excerpts from ARDOC's *"Coordinated Response Plan"* states,

"DETERMINATION OF FINDINGS:

All sexual abuse allegations will receive an Internal Affairs investigation. The Internal Affairs Administrator, Deputy Director, Director, and Secretary will determine the investigative outcome for all sexual abuse investigations. There are three potential investigative outcomes for sexual abuse investigations:

1. ***Substantiated:*** *Allegation was determined to have occurred*
2. ***Unsubstantiated:*** *Investigation produced insufficient evidence to make a final determination*
3. ***Unfounded:*** *Allegation was determined to not have occurred"*

While on site, this auditor interviewed 3 BEU Administrative PREA Investigators, who are designated to conduct PREA investigations. Each interviewed investigator knew their responsibilities regarding evidence collection, Miranda/Garrity rights, interviewing procedures, retaliation monitoring, and report-writing protocols, and evidentiary standards for administrative PREA investigations. BEU's PCM also submitted copies of all three interviewed PREA Investigator's Specialized Training through ARDOC's *"Sexual Abuse Investigations Training (SAIT)."*

This auditor requested to see a random selection of completed PREA Administrative Investigations within the last 12 months. This auditor reviewed 5 PREA investigations from the past 12 months at BEU (3 Sexual Abuse; 2 Sexual Harassment). This auditor reviewed BEU's PREA Investigator reporting style and investigation content. The reviewed investigation files submitted were complete. The content within the file had a structured order to conduct a proper review. The investigation reports had a summary of the investigation provided, along with a PREA investigation outcomes *"Cover Sheet"* (which ARDOC uses to share the outcomes of the PREA Administrative Investigation) to identify the preponderance of evidence determination/outcome (unsubstantiated, substantiated, or unfounded). One file did not have a preponderance of evidence determination therein.

Moreover, during BEU's onsite PREA audit closeout debriefing meeting with ARDOC's PC, BEU's Superintendent, and BEU's Captains and Major, this auditor made some recommendations. This auditor recommended that ARDOC revise their *"PREA Investigation Determination Cover Sheet"* to align with their *"Secretarial Directive (2024-02),"* their *"Coordinated Response Plan,"* and this PREA Standard. ARDOC's *"PREA Investigation Determination Cover Sheet"* should only have *"unsubstantiated,"* *"substantiated,"* or *"unfounded"* as the preponderance of evidence options.

On 2/4/2025, ARDOC's PC submitted ARDOC's revised *"PREA Investigation Determination Cover Sheet"* (on ARDOC letterhead), to align with their *"Secretarial*

Directive (2024-02) and “Coordinated Response Plan” as evidence of compliance with this PREA Standard 115.72. The revised ARDOC “*PREA Investigation Determination Cover Sheet*” only identifies “*Unsubstantiated,*” “*Substantiated,*” or “*Unfounded*” as the preponderance of evidence options, to align with this PREA Standard. ARDOC also revised the process so that the PREA Coordinator will complete a final review of the investigation to determine preponderance of evidence to ensure that the outcome aligns with PREA Standards of Administrative investigations.

This auditor recommends BEU ensure that each concluded PREA Administrative Investigation packet has a completed “*PREA Investigation Determination Cover Sheet*” accompanied by its investigation content. Additionally, this auditor recommended that BEU establish a period of consistent practice of following/adhering to the above-mentioned recommendations for investigations preponderance of evidence, as well as its procedures, before a determination of compliance can be concluded. This PREA auditor concluded that Barbara Ester Unit (BEU) was not in compliance with PREA Standard 115.72. Corrective Action was required.

During Barbara Ester Unit’s (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and email correspondence with ARDOC’s PREA Coordinator (PC) and BEU’s Deputy Warden/PREA Compliance Manager (DW/PCM). The goal was to discuss the recommended corrective actions needed to meet compliance with this standard. After the meetings and email correspondence, this auditor requested to review 8 randomly selected completed PREA investigations which occurred during this Corrective Action Period (CAP). ARDOC’s PREA Coordinator submitted the 8 requested PREA Investigations which occurred during this Corrective Action Period (3 SA and 5 SH PREA investigations) (1 substantiated staff on inmate sexual harassment; 2 unsubstantiated inmate on inmate sexual harassment; 1 unfounded staff on inmate sexual abuse, 2 unfounded inmate on inmate sexual abuse, and 2 substantiated inmate on inmate sexual harassment). Each investigation file submitted was neatly organized, structured, and had detailed and robust content from initial incidents and interviews to evidence identification. Furthermore, all 8 investigation reports had a detailed summary of the investigation and ARDOC’s PREA investigation outcomes “*PREA Investigation Determination Cover Sheet*” (which shares the preponderance of evidence outcomes of the PREA Administrative Investigation as either being “unsubstantiated,” “substantiated,” or “unfounded”). The 3 unfounded sexual abuse investigations had signed/completed “*Notice of PREA Investigation Status*” (inmate notification). There were 0 unsubstantiated/substantiated sexual abuse investigations. BEU “*Sexual Abuse Incident Review*” team meetings were not required.

This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.72.

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard

Auditor Discussion

This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center's Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.73. Barbara Ester Unit (BEU) submitted their "Arkansas Department of Corrections PREA Secretarial Directive (2024-02)" #1A-27 as evidence of compliance with PREA Standard 115.73. An excerpt states, *"The Victim shall be informed within thirty (30) days of the conclusion of the investigation."*

It shall be documented when the:

a. Allegation has been determined to be Substantiated, Unsubstantiated, or Unfounded.

b. Perpetrator is no longer posted within the Victim's unit.

c. Perpetrator is no longer employed. d. Perpetrator has been indicted or convicted on a charge related to the Sexual Abuse.

The obligation to inform the Victim shall terminate if they are released from custody."

This PREA auditor also reviewed ARDOC's "Coordinated Response Plan," which is a written prescription of the actions and conduct of all ARDOC facility level and agency level staff involved in incidents of sexual abuse and sexual harassment (amongst staff first responders, medical and mental health practitioners, investigators, and facility leadership). Excerpts from ARDOC's "Coordinated Response Plan" offender notification sections states,

"OFFENDER NOTIFICATION

PREA Coordinator:

Upon notification of an investigative outcome of sexual abuse, the PREA Coordinator shall complete the following duties:

1) Send notification of the investigative outcome ("Sexual Abuse Notification Form") to the PREA Compliance Manager.

PREA Compliance Manager:

Upon notification of an investigative outcome of sexual abuse, the PREA Compliance Manager shall complete the following duties:

2) Ensure victim receives notification of their sexual abuse investigative outcome provided by the PREA Coordinator."

While onsite, this auditor also interviewed 3 BEU Administrative PREA Investigators. This auditor shared a scenario of an inmate being sexually assaulted in the shower,

and asked, *“What is the PREA Investigator’s coordinated responsibilities?”* All investigators knew their responsibilities of evidence collection, Miranda/Garrity rights, interviewing procedures, understanding victim trauma, and investigation report-writing protocols. Both investigators identified the specialized training they received regarding investigating sexual abuse in confinement facilities. This auditor reviewed all interviewed PREA investigator’s training transcript submitted by ARDOC’s PREA Coordinator. These training transcripts verified the specialized training that the ARDOC PREA investigators received training through ARDOC’s 3-day *“Sexual Assault Investigation’s Training.”*

This auditor requested to see a random selection of completed PREA Administrative Investigations within the last 12 months. This auditor reviewed 5 PREA investigations from the past 12 months at BEU (3 Sexual Abuse; 2 Sexual Harassment). This auditor reviewed BEU’s PREA Investigator reporting style and investigation content. The reviewed investigation files submitted were complete. The content within the file had a structured order to conduct a proper review. The investigation reports had a summary of the investigation provided, along with a PREA investigation outcomes *“Cover Sheet”* (which ARDOC uses to share the outcomes of the PREA Administrative Investigation) to identify the preponderance of evidence determination/outcome (unsubstantiated, substantiated, or unfounded). One file did not have a preponderance of evidence determination therein. Additionally, 0 out of the 3 reviewed sexual abuse investigations had *“Notice of Investigation Status”* (inmate notification).

Finally, this auditor interviewed ARDOC’s PC who shared that at the conclusion of all PREA Investigations, she completes the contents of the *“Notice of Investigation Status”* (inmate notification), then emails it to the facility’s PREA Compliance Manager (PCM). The facility’s PCM is responsible for presenting/delivering the inmate notification to the inmate who initially made the PREA allegation/alleged victim. Once the *“Notice of Investigation Status”* is presented/delivered to the inmate, the inmate signs, acknowledging receipt or the notification. ARDOC’s PREA Coordinator further shared that the completed *“Notice of PREA Investigation Status”* is this uploaded in ARDOC’s *“eOmis”* system.

This auditor recommended that BEU’s PREA Compliance Manager establish a consistency in practice of ensuring that inmates who allege sexual abuse receive a *“Notice of PREA Investigation Status”* of the outcome of their PREA investigation, before a determination of compliance can be concluded. This *“Notice of PREA Investigation Status”* should be signed and be a part of the completed/concluded PREA Administrative Investigation paperwork/packet. This PREA auditor concluded that Barbara Ester Unit (BEU) was not in compliance with PREA Standard 115.73. Corrective Action was required.

During Barbara Ester Unit’s (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and email correspondence with ARDOC’s PREA Coordinator (PC) and BEU’s Deputy Warden/PREA Compliance Manager (DW/PCM). The goal was to discuss the recommended corrective actions needed to meet compliance with this standard. After the meetings and email

	<p>correspondence, this auditor requested to review 8 randomly selected completed PREA investigations which occurred during this Corrective Action Period (CAP).</p> <p>ARDOC's PREA Coordinator submitted the 8 requested PREA Investigations which occurred during this Corrective Action Period (3 SA and 5 SH PREA investigations) (1 substantiated staff on inmate sexual harassment; 2 unsubstantiated inmate on inmate sexual harassment; 1 unfounded staff on inmate sexual abuse, 2 unfounded inmate on inmate sexual abuse, and 2 substantiated inmate on inmate sexual harassment). Each investigation file submitted was neatly organized, structured, and had detailed and robust content from initial incidents and interviews to evidence identification. Furthermore, all 8 investigation reports had a detailed summary of the investigation and ARDOC's PREA investigation outcomes "<i>PREA Investigation Determination Cover Sheet</i>" (which shares the preponderance of evidence outcomes of the PREA Administrative Investigation as either being "unsubstantiated," "substantiated," or "unfounded"). The 3 unfounded sexual abuse investigations had signed/completed "<i>Notice of PREA Investigation Status</i>" (inmate notification). There were 0 unsubstantiated/substantiated sexual abuse investigations. BEU "<i>Sexual Abuse Incident Review</i>" team meetings were not required.</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.73.</p>
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115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center's Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.76. Barbara Ester Unit (BEU) submitted their "Arkansas Department of Corrections PREA Secretarial Directive (2024-02)" as evidence of compliance with PREA Standard 115.76. An excerpt states, "<i>a. Staff shall be subject to disciplinary sanctions up to and including termination for violating Sexual Abuse or Sexual Harassment policies.</i></p> <p style="padding-left: 40px;"><i>b. Termination shall be the presumptive disciplinary sanction for Staff who engage in Sexual Abuse. The former employee will not be eligible for rehire.</i></p> <p style="padding-left: 40px;"><i>c. Disciplinary sanctions shall be commensurate with the nature and circumstances of the acts committed and the Staff member's disciplinary history.</i></p> <p style="padding-left: 40px;"><i>d. All terminations for Sexual Abuse, or resignations of Staff who would have been terminated if not for their resignation, will be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies."</i></p>

	<p>This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and concluded that it has the necessary language to align with PREA Standard 115.76.</p> <p>While on site, this auditor interviewed BEU’s Superintendent who shared that BEU’s response for substantiated outcomes of staff sexual abuse and sexual harassment investigations can range in various forms of disciplinary actions, up to termination and criminal referral. This auditor also interviewed ARDOC’s PREA Coordinator, who shared that once ARDOC’s Internal Affairs concludes/affirms that the investigation is substantiated for staff sexual abuse, they take immediate legal action, and termination is ARDOC’s presumptive response. After this onsite audit, this auditor contacted and interviewed ARDOC’s Internal Affairs Director (via ZOOM). He confirmed ARDOC’s “Zero Tolerance” policy for sexual abuse and sexual harassment, as well as the information shared by ARDOC’s PREA Coordinator and BEU’s Superintendent.</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.76.</p>
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115.77 Corrective action for contractors and volunteers	
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.77. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.77. An excerpt states, <i>“a. Staff shall be subject to disciplinary sanctions up to and including termination for violating Sexual Abuse or Sexual Harassment policies.</i></p> <p style="padding-left: 40px;"><i>b. Termination shall be the presumptive disciplinary sanction for Staff who engage in Sexual Abuse. The former employee will not be eligible for rehire.</i></p> <p style="padding-left: 40px;"><i>c. Disciplinary sanctions shall be commensurate with the nature and circumstances of the acts committed and the Staff member’s disciplinary history.</i></p> <p style="padding-left: 40px;"><i>d. All terminations for Sexual Abuse, or resignations of Staff who would have been terminated if not for their resignation, will be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.”</i></p> <p>This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and has concluded that it has the necessary language to align with PREA Standard 115.77.</p>

	<p>While on site, this auditor interviewed BEU’s Superintendent who shared that ARDOC’s and BEU’s corrective action responses for substantiated sexual abuse outcomes for contracted staff, contractors, and volunteers can range in various forms of disciplinary measures, up to notifying licensing bodies and criminal referral. This auditor also interviewed ARDOC’s PREA Coordinator, who shared that once ARDOC’s Internal Affairs concludes/affirms that the investigation is substantiated for staff sexual abuse, they take immediate legal action and cease all contact with and access to ARDOC facilities. After this onsite audit, this auditor contacted and interviewed ARDOC's Internal Affairs Director (via ZOOM). He confirmed ARDOC's "Zero Tolerance" policy for sexual abuse and sexual harassment, as well as the information shared by BEU's Superintendent and ARDOC’s PREA Coordinator.</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.77.</p>
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115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.78. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.78. An excerpt states, <i>“a. Offenders may be disciplined for Substantiated incidents of Offender-on-Offender Sexual Abuse. If an Offender has pending disciplinary sanctions for Offender-on-Offender Sexual Abuse, consideration shall be given as to whether the Offender’s mental disabilities or mental illness contributed to his or her behavior when determining what level of sanction, if any, will be imposed.</i></p> <p style="padding-left: 40px;"><i>b. An Offender may be labeled as a PREA Sex Offender in eOMIS for any substantiated allegation of Sexual Abuse. The PREA Sex Offender precaution shall be approved by the facility PCM and DOC PREA Coordinator.</i></p> <p style="padding-left: 40px;"><i>c. Offenders may not be disciplined for Sexual Abuse of a Staff member if the Staff member consented.</i></p> <p style="padding-left: 40px;"><i>d. An Offender may be disciplined for reporting a false allegation of Sexual Abuse or Sexual Harassment only where the facility can demonstrate the false allegation was knowingly made in bad faith. A report made in good faith based upon a reasonable belief that the conduct occurred shall not constitute a false report or lying even if an investigation does not establish evidence sufficient to substantiate the allegation.</i></p>

e. An Offender may be disciplined for abusing the PREA Hotline. Abuse includes, but is not limited to:

- i. Calling about a non-PREA related issue;*
- ii. Repeatedly calling about the same allegation; or*
- iii. Threatening the safety of Staff or other Offenders.”*

This auditor also reviewed “Arkansas Department of Corrections Administrative Directive (2024-04)-Inmate Disciplinary Manual” as evidence of compliance with PREA Standard 115.78. An excerpt states, “PREA Charge = Any Rule Violation that is connected to the Prison Rape Elimination Act (PREA) and requires a response directed by the Department’s PREA Policy. The outcome for a PREA violation may direct a precaution to be entered into the electronic offender file indicating predator or victim identifications. This would include incidents of:

1. Sexual misconduct;
2. Rape or forced sexual act;
3. Masturbation in the presence of another;
4. Sexual threats;
5. Sexual harassment;
6. Demanding sexual acts in trade; and
7. Aiding or abetting in any of the above.

Additionally, ARDOC’s Administrative Directive (2024-04) identifies the following acts are considered Class A penalty class behaviors. Class A behaviors are the highest disciplinary behaviors within all ARDOC’s facilities. The PREA related behaviors are as follows:

SEXUAL ACTIVITY CATEGORIES

10-1. Engaging in non-abusive sexual activity with another consenting person.

10-2. Making sexual proposals to another person. (PREA)

10-3. Indecent Exposure and/or Masturbation; may result in a referral for criminal prosecution (examples include, but are not limited to, verbal and/or non-verbal gestures).

10-4. Bestiality.

10-5. Masturbation in the presence of another inmate.

10-7. Demanding sexual contact in trade or for protection from physical harm or mental anguish, or other victimization.

4-10. Rape or forced sexual act with/on an inmate. Rule Violation may result in the loss of all good time. (PREA) Rape is a crime and may result in criminal prosecution for a Class Y Felony. If convicted, may result in a life sentence.

4-19. Rape or forced sexual act on staff, volunteer, contractor or other individual not incarcerated at the time of the incident. Rule Violation may result in the loss of all good time. Rape is a crime and may result in criminal prosecution for a Class Y Felony. If convicted, may result in a life sentence.

This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and “Administrative Directive (2024-04),” concluding that both has the necessary language to align with PREA Standard 115.78.

While onsite, this auditor interviewed 32 inmates and asked about BEU’s rules and sanctions for inmate-on inmate sexual abuse or sexual harassment. Inmates were clear that sexual abuse and sexual harassment is not tolerated at BEU’s facility. Each interviewed inmate stated that sexual abuse is not tolerated and is a “**CLASS A**” infraction. This PREA auditor also interviewed BEU’s Superintendent. He shared that BEU’s protocol on substantiated inmate-on-inmate sexual abuse investigations. He was aligned with ARDOC’s above-mentioned directives on inmate sanctions for sexual abuse/sexual harassment. BEU’s Superintendent also shared that disciplinaries are handled by the “Disciplinary Hearing Committee” to provide sanctions and interventions for inmates.

Finally, BEU’s Superintendent shared that inmate sanctions are commensurate with the nature and circumstances of the abuse committed, the inmate’s disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories. He also shared that the disciplinary committee does take into consideration any diagnosed/documentated history of mental health/mental disabilities prior to making sanction determinations.

This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.78.

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.81. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.81. An excerpt states, “<i>When an assessment indicates an Offender has experienced Victimization or previously been a Perpetrator, Staff shall ensure the Offender has been offered a follow-up for counseling and monitoring with the appropriate medical or mental health professional within fourteen (14) days of the</i></p>

assessment.”

This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and has concluded that it has the necessary language to align with PREA Standard 115.81.

While on site, this auditor reviewed ARDOC’s “PREA Risk Screening” tool in “eOmis” and concluded that it consisted of the necessary screening questions to identify inmate history of sexual victimization and history of abusiveness. This auditor also interviewed BEU’s Classification Officer who explained the process of gathering risk of victimization and abusive information in the “eOmis” system. During the interview, BEU’s Classification Officer shared that every inmate intake comes from Arkansas Department of Corrections (ARDOC) intake facility, where their initial intake is conducted. They further stated, *“Once an inmate arrives at this facility, we conduct a “Transfer-In” PREA Risk Screening in “eOmis.” This is where we gather information about history of sexual victimization and sexual abusiveness.”*

This auditor also interviewed WellPath’s Mental Health Director. This auditor asked if inmates who are screened, at intake, to have history of sexual victimization or sexual perpetration are receiving a follow-up meeting with mental health staff within 14 days of their intake screening. He shared that they were not currently conducting 14-day follow-ups with inmates who are screened to have history of sexual victimization and/or sexual abusiveness (14-days from intake PREA Risk Screening). BEU’s Mental Health Director shared that 14-day follow-ups are not occurring, but there is a plan in place for Medical to complete initial PREA Screenings and they will communicate to Mental Health when a 14-Day assessment is needed. This new process should begin at the start of the new year.

This auditor recommended that WellPath’s Mental Health team establish a procedure that receives information from the *“Transfer PREA Risk Screening”* which identifies inmates with history of sexual victimization or sexual abusiveness/perpetration, to conduct a follow-up within 14 days of the screening. This system should also contain a way to remind the mental health practitioner to complete the follow-up within the 14-day period. Finally, these 14-day follow-up meetings should be an individual session with the inmate and properly documented in the case notes in “eOmis.” An example documentation could be, *“This follow up session is a result of a referral from BEU’s PREA Risk Screening where the inmate screened to have history of sexual victimization or history of sexual abusiveness. This practitioner (follow-up points touch on).....This inmate was offered a _____ packet. This inmate agreed/ disagreed with check-in sessions (frequency).”* This PREA auditor concluded that Barbara Ester Unit (BEU) was in compliance with PREA Standard 115.81. Corrective Action was required.

During Barbara Ester Unit’s (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and email correspondence with ARDOC’s PREA Coordinator (PC) and BEU’s Deputy Warden/PREA Compliance Manager (DW/PCM). The goal was to discuss the recommended corrective actions needed to meet compliance with this standard. After the meetings and email correspondence, this auditor requested to review *“Mental Health Services*

	<p><i>Encounters</i>” of inmates, in 9/2025. who had history of sexual victimization and sexual abusiveness. ARDOC’s PREA Coordinator submitted 19 Wellpath <i>“Mental Health Services Encounters,”</i> which entailed Wellpath’s mental health practitioner’s follow-up session notes. The follow-up notes described the purpose of the meeting, inmate’s presenting demeanor, process packet offerings, services offerings, or a signed refusal form, refusing follow-up services (if the inmate refused follow-up services).</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.81.</p>
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115.82	Access to emergency medical and mental health services
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.82. Barbara Ester Unit (BEU) submitted their <i>“Arkansas Department of Corrections PREA Secretarial Directive (2024-02)”</i> as evidence of compliance with PREA Standard 115.82. An excerpt states, <i>“a. All Offenders who have been Victims of Sexual Abuse in any correctional facility shall be offered medical and mental health evaluations and, as appropriate, any necessary treatment related to Sexual Abuse. This includes timely and unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which shall be determined by medical and mental health practitioners according to their professional judgment. This also includes timely and comprehensive information about emergency contraception, pregnancy testing, sexually transmitted infection testing and prophylaxis, and lawful pregnancy-related medical services deemed appropriate by the medical practitioner.</i></p> <p style="padding-left: 40px;"><i>b. Mental health practitioners shall attempt to conduct an evaluation on all known Offender-on-Offender Perpetrators within sixty (60) days of learning of such abuse and provide treatment as deemed appropriate.</i></p> <p style="padding-left: 40px;"><i>c. Current and previous Victims of Sexual Abuse shall receive any medical and mental health services related to the Sexual Abuse at no cost to the Offender.”</i></p> <p>This auditor reviewed <i>“ARDOC’s Secretarial Directive (2024-02)”</i> and has concluded that it has the necessary language to align with PREA Standard 115.82.</p> <p>While on site, this auditor conducted an exhaustive site review/tour of BEU and observed a medical triage area for medical services at BEU. This auditor interviewed medical contractor, WellPath’s Health Services Administrator, who shared that BEU primarily utilizes <i>“University of Arkansas Medical Sciences Hospital”</i> for medical</p>

	<p>services for their inmates. WellPath’s Health Services Administrator and additional nursing personnel assist inmates in navigating the services BEU inmates need. The WellPath Health Services Administrator and Mental Health Director shared that medical and mental health decisions are made based on their professional judgements, and victims’ inmates are informed about emergency contraception by the local hospital they are taken to and followed up by BEU (or the hospital based on the scope of follow-up).</p> <p>Additionally, the Health Services Administrator and Mental Health Director shared that BEU staff work together to ensure that that victims receive appropriate medical and mental health care, as well as emotional support provisions. BEU inmate victims of sexual abuse receive unimpeded access to medical services with community partner hospitals for acute/serious medical services. Finally, WellPath’s Mental Health Director and Health Service Administrator both shared that medical, mental health, and crisis intervention services are provided to the victims of sexual abuse without financial cost.</p> <p>Finally, this auditor interviewed a random selection of 32 inmates, asking about the effectiveness of medical and mental health care. All 32 inmates shared positive responses about the provision of support, response, and assistance by BEU and ARDOC team of staff. There was consistency in responses to “sick inmates” turnaround time is within 24 to 72 hours, triaged based on urgency (“4-3-2-1 triage protocol”).</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.82.</p>
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<p>115.83</p>	<p>Ongoing medical and mental health care for sexual abuse victims and abusers</p>
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.83. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.83. An excerpt states, <i>“a. All Offenders who have been Victims of Sexual Abuse in any correctional facility shall be offered medical and mental health evaluations and, as appropriate, any necessary treatment related to Sexual Abuse. This includes timely and unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which shall be determined by medical</i></p>

and mental health practitioners according to their professional judgment. This also includes timely and comprehensive information about emergency contraception, pregnancy testing, sexually transmitted infection testing and prophylaxis, and lawful pregnancy-related medical services deemed appropriate by the medical practitioner.

b. Mental health practitioners shall attempt to conduct an evaluation on all known Offender-on-Offender Perpetrators within sixty (60) days of learning of such abuse and provide treatment as deemed appropriate.

c. Current and previous Victims of Sexual Abuse shall receive any medical and mental health services related to the Sexual Abuse at no cost to the Offender.”

This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and has concluded that it has the necessary language to align with PREA Standard 115.83.

While on site, this auditor conducted an exhaustive site review/tour of BEU and observed a medical triage area for medical services at BEU. This auditor interviewed medical contractor, WellPath’s Health Services Administrator, who shared that BEU primarily utilizes “*University of Arkansas Medical Sciences Hospital*” for medical services for their inmates. WellPath’s Health Services Administrator and additional nursing personnel assist inmates in navigating the services BEU inmates need.

Additionally, the Health Services Administrator and Mental Health Director shared that BEU staff work together to ensure that that victims receive appropriate medical and mental health care, as well as emotional support provisions. BEU inmate victims of sexual abuse receive unimpeded access to medical services with community partner hospitals for acute/serious medical services. The WellPath Health Services Administrator and Mental Health Director shared that medical, mental health, and crisis intervention services are provided to the victims of sexual abuse without financial cost.

Wellpath’s Medical Director and HSA further stated that inmate victims are also provided follow-up by BEU medical team and in collaboration with medical services through the local hospital. Inmates are also offered sexually transmitted infections tests, informed about emergency contraception by the local hospital they are taken to and followed up by BEU (or the hospital based on the scope of follow-up). Finally, Wellpath’s HSA shared that medical and mental health decisions are made based on their professional judgements.

Finally, this auditor interviewed a random selection of 32 inmates, asking about the effectiveness of medical and mental health care. All 32 inmates shared positive responses about the provision of support and assistance by WellPath staff. There was consistency in responses to “sick inmates” turnaround time is within 24 to 72 hours, triaged based on urgency (“4-3-2-1 triage protocol”).

This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.83.

115.86	Sexual abuse incident reviews
	<p data-bbox="256 188 959 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 264 544 300">Auditor Discussion</p> <p data-bbox="256 340 1481 913">This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.86. Barbara Ester Unit (BEU) submitted their “Arkansas Department of Corrections PREA Secretarial Directive (2024-02)” as evidence of compliance with PREA Standard 115.86. An excerpt states, <i>“All facilities shall conduct a review, ordinarily within thirty (30) days, at the conclusion of every Sexual Abuse investigation unless the allegation was determined to be Unfounded. An investigation shall be deemed to be concluded upon the review and approval of the investigation report by the Internal Affairs Division, Division Director, and the Secretary. The review team shall consist of upper-level management officials with input from line supervisors, investigators, and medical or mental health practitioners. The review team shall:</i></p> <ul style="list-style-type: none"> <li data-bbox="256 954 1445 1034"><i>a. Consider whether the allegation or investigation indicated a need to revise policies or practices to better prevent, detect, or respond to Sexual Abuse.</i> <li data-bbox="256 1070 1481 1191"><i>b. Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; LGBTI identification, status, or perceived status; gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility.</i> <li data-bbox="256 1227 1374 1308"><i>c. Examine the area in the facility where the incident occurred to assess whether physical barriers in the area may enable abuse.</i> <li data-bbox="347 1339 1425 1375"><i>d. Assess the adequacy of Staffing levels in that area during different shifts.</i> <li data-bbox="256 1411 1466 1491"><i>e. Assess whether monitoring technology should be deployed or augmented to supplement supervision by Staff.</i> <li data-bbox="256 1527 1469 1648"><i>f. Prepare a report of its findings, including determinations made from sections a-e and any recommendations for improvement and submit the report to the facility head and PCM.</i> <p data-bbox="256 1680 1481 1760"><i>The facility shall implement the recommendations for improvement or shall document its reasons for not doing so.”</i></p> <p data-bbox="256 1792 1445 1872">This auditor reviewed “ARDOC’s Secretarial Directive (2024-02)” and has concluded that it has the necessary language to align with PREA Standard 115.86.</p> <p data-bbox="256 1904 1481 2074">While on site, this auditor interviewed BEU’s Superintendent. He shared that "Sexual Abuse Incident Reviews" (SAIR) are required to occur within 30 days of the conclusion of sexual abuse investigations (substantiated and unsubstantiated). He further shared that the team has assembled an SAIR team and an SAIR meeting has been</p>

conducted. This auditor also interviewed ARDOC's PREA Coordinator (PC), who shared that each facility's PCM is responsible for completing SAIR team meetings. She also shared that she has informed each facility PCM of their responsibility to complete SAIR meeting at the conclusion of sexual abuse investigation. ARDOC's PREA Coordinator submitted ARDOC's "30-Day Sexual Abuse Incident Review" form used when review meeting occurs. The form contained all the components which align with PREA Standard 115.86. The review questions within ARDOC's "30-Day Sexual Abuse Incident Review" included:

1. *Identifying whether the allegation or investigation indicates a need to change ARDOC's policy or practice to better prevent, detect, or respond to sexual abuse.*
2. *Identifying whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility.*
3. *Assessing the area in the facility where the incident allegedly occurred to assess whether blind spots or barriers in the area may enable abuse.*
4. *Assessing staffing levels in that area during the shift at the time of the incident.*
5. *Assessing whether there's a need for video/audio monitoring technology to supplement supervision by staff.*

ARDOC's "30-Day Sexual Abuse Incident Review" form culminates to a findings and recommendations section, which determines need based on the above-mentioned assessments by the SAIR team.

Additionally, this auditor requested complete investigations within the past 12 months. This auditor reviewed 5 randomly selected PREA investigations (2 Sexual Harassment and 3 Sexual Abuse). While reviewing each selected completed investigation packet, this auditor observed that there were no "Sexual Abuse Incident Review" team meeting verifications provided by BEU for the 2 unsubstantiated Sexual Abuse investigations within 12 months. The remaining sexual abuse investigation had a finding of unfounded.

This auditor recommended that BEU develop a documented procedure that ensures that all "substantiated" and "unsubstantiated" sexual abuse investigations receive a "Sexual Abuse Incident Review" within 30 days of the completion of the investigation. Finally, this auditor recommended BEU establish a consistency in practice of conducting SAIR team meetings within the 30 days after the conclusion of sexual abuse investigations, before compliance can be determined. This PREA auditor concluded that Barbara Ester Unit (BEU) was not in compliance with PREA Standard 115.86. Corrective Action was required.

During Barbara Ester Unit's (BEU) Corrective Action Period (CAP), this auditor conducted and engaged in a series of meetings and email correspondence with ARDOC's PREA Coordinator (PC) and BEU's Deputy Warden/PREA Compliance

	<p>Manager (DW/PCM). The goal was to discuss the recommended corrective actions needed to meet compliance with this standard. After the meetings and email correspondence, this auditor requested to review 8 randomly selected completed PREA investigations which occurred during this Corrective Action Period (CAP).</p> <p>ARDOC's PREA Coordinator submitted the 8 requested PREA Investigations which occurred during this Corrective Action Period (3 SA and 5 SH PREA investigations) (1 substantiated staff on inmate sexual harassment; 2 unsubstantiated inmate on inmate sexual harassment; 1 unfounded staff on inmate sexual abuse, 2 unfounded inmate on inmate sexual abuse, and 2 substantiated inmate on inmate sexual harassment). Each investigation file submitted was neatly organized, structured, and had detailed and robust content from initial incidents and interviews to evidence identification. Furthermore, all 8 investigation reports had a detailed summary of the investigation and ARDOC's PREA investigation outcomes "<i>PREA Investigation Determination Cover Sheet</i>" (which shares the preponderance of evidence outcomes of the PREA Administrative Investigation as either being "unsubstantiated," "substantiated," or "unfounded"). The 3 unfounded sexual abuse investigations had signed/completed "<i>Notice of PREA Investigation Status</i>" (inmate notification). There were 0 unsubstantiated/substantiated sexual abuse investigations. BEU "<i>Sexual Abuse Incident Review</i>" team meetings were not required.</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.86.</p>
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115.87	Data collection
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center's Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.87. Barbara Ester Unit follows the Arkansas Department of Corrections policies and submitted the "Arkansas Department of Corrections PREA Secretarial Directive (2024-02: Subject: PREA)" as evidence of compliance with PREA Standard 115.87. An excerpt states, "<i>1. Data shall be collected for every allegation of Sexual Abuse using the PREA investigating screens in eOMIS designed to contain the data necessary to answer all questions for the Survey of Sexual Violence requested annually from the Department of Justice for the set of definitions. All data collected shall be securely retained.</i></p> <p><i>2. Each facility shall document the number of allegations, completed investigations, and investigative outcomes in a monthly report. The report shall be submitted to the PREA Coordinator along with the facilities tracking spreadsheet.</i></p>

3. All data from available incident-based documents related to allegations of Sexual Abuse shall be collected, reviewed, and maintained as needed.

4. Data shall be obtained from each private facility which contracts for the confinement of DOC Offenders.

5. Aggregated data collected shall be made available to the public annually through the DOC website.

6. All case records associated with claims of sexual offenses, including incident reports, investigation reports, Offender information, case disposition, and medical and counseling evaluation findings and recommendations for post-release treatment or counseling, shall be retained in accordance with the records retention schedule.”

This auditor reviewed “ARDOC’s Secretarial Directive (2024-02: Subject: PREA) and concludes that they have the necessary language to align with PREA Standard 115.87.

This auditor interviewed ARDOC’s PREA Coordinator (PC). She shared the process for collecting and aggregating monthly data on sexual abuse/sexual harassment incidents and investigations. She also shared that she receives sexual abuse incident/investigation information from each ARDOC facility’s PREA Compliance Manager/Administrator, develops monthly and annual reports, then submits them to ARDOC’s Secretary of Corrections for review/approval.

While onsite at ARDOC’s Headquarters, this auditor interviewed ARDOC’s PREA Coordinator (PC). She shared the process for collecting and aggregating monthly data on sexual abuse/sexual harassments incidents and investigations. She also shared that she receives sexual abuse incident/investigation information from each ARDOC facility’s PREA Compliance Manager/Superintendent, develop monthly and annual reports, then submit ARDOC’s Secretary of Corrections for review/approval. This PREA auditor also interviewed ARDOC’s IT/Social Media Manager, who is the gatekeeper of electronic information being disseminated to the public via ARDOC’s website (after approval from ARDOC’s Secretary of Corrections (agency head) and PREA Coordinator’s submittal).

Additionally, ARDOC’s IT/Social Media Manager walked this auditor through the process once she receives PREA Annual Reports to the reports “going live” onto ARDOC’s website for public viewing. Finally, ARDOC’s PC and IT/Social Media Manager shared that Personal Identifiers are not written into annual reports or redacted prior to “going live” for public viewing. Finally, this auditor reviewed annual reports on ARDOC’s website from 2015 through 2024. Each report contained corrective actions taken. ARDOC’s IT/Social Media Manager shared that ARDOC PREA-related documents are still available for up to 10 years. Each report contained corrective actions taken.

This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.87.

115.88	Data review for corrective action
	<p data-bbox="256 188 959 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 264 544 300">Auditor Discussion</p> <p data-bbox="256 340 1481 833">This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.88. Barbara Ester Unit follows the Arkansas Department of Corrections policies and submitted the “Arkansas Department of Corrections PREA Secretarial Directive (2024-02: Subject: PREA)” as evidence of compliance with PREA Standard 115.88. An excerpt states, <i>“1. Data shall be collected for every allegation of Sexual Abuse using the PREA investigating screens in eOMIS designed to contain the data necessary to answer all questions for the Survey of Sexual Violence requested annually from the Department of Justice for the set of definitions. All data collected shall be securely retained.</i></p> <p data-bbox="256 873 1461 990"><i>2. Each facility shall document the number of allegations, completed investigations, and investigative outcomes in a monthly report. The report shall be submitted to the PREA Coordinator along with the facilities tracking spreadsheet.</i></p> <p data-bbox="256 1025 1449 1102"><i>3. All data from available incident-based documents related to allegations of Sexual Abuse shall be collected, reviewed, and maintained as needed.</i></p> <p data-bbox="256 1137 1311 1214"><i>4. Data shall be obtained from each private facility which contracts for the confinement of DOC Offenders.</i></p> <p data-bbox="256 1249 1449 1326"><i>5. Aggregated data collected shall be made available to the public annually through the DOC website.</i></p> <p data-bbox="256 1361 1461 1527"><i>6. All case records associated with claims of sexual offenses, including incident reports, investigation reports, Offender information, case disposition, and medical and counseling evaluation findings and recommendations for post-release treatment or counseling, shall be retained in accordance with the records retention schedule.”</i></p> <p data-bbox="256 1563 1433 1684">This auditor reviewed “ARDOC’s Secretarial Directive (2024-02: Subject: PREA) and concludes that they have the necessary language to align with PREA Standard 115.88.</p> <p data-bbox="256 1720 1474 2087">While onsite at ARDOC’s Headquarters, this auditor interviewed ARDOC’s PREA Coordinator (PC). She shared the process for collecting and aggregating monthly data on sexual abuse/sexual harassments incidents and investigations. She also shared that she receives sexual abuse incident/investigation information from each ARDOC facility’s PREA Compliance Manager/Superintendent, develop monthly and annual reports, then submit ARDOC’s Secretary of Corrections for review/approval. This PREA auditor also interviewed ARDOC’s IT/Social Media Manager, who is the gatekeeper of electronic information being disseminated to the public via ARDOC’s website (after approval from ARDOC’s Secretary of Corrections (agency head) and PREA</p>

	<p>Coordinator’s submittal).</p> <p>Additionally, ARDOC’s IT/Social Media Manager walked this auditor through the process once she receives PREA Annual Reports to the reports “going live” onto ARDOC’s website for public viewing. Finally, ARDOC’s PC and IT/Social Media Manager shared that Personal Identifiers are not written into annual reports or redacted prior to “going live” for public viewing. Finally, this auditor reviewed annual reports on ARDOC’s website from 2015 through 2024. Each report contained corrective actions taken. ARDOC’s IT/Social Media Manager shared that ARDOC PREA-related documents are still available for up to 10 years.</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.88.</p>
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115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>This PREA Auditor reviewed Barbara Ester Unit (BEU) pre-audit evidentiary documents uploaded via PREA Resource Center’s Online Audit System (OAS), as well as documents submitted through other electronic sources. This PREA Auditor also relied upon documentation from on-site interviews, as well as on-site documents/files reviewed and observations to determine compliance for Standard 115.89. Barbara Ester Unit follows the Arkansas Department of Corrections policies and submitted the “Arkansas Department of Corrections PREA Secretarial Directive (2024-02: Subject: PREA)” as evidence of compliance with PREA Standard 115.89. An excerpt states, “1. <i>Data shall be collected for every allegation of Sexual Abuse using the PREA investigating screens in eOMIS designed to contain the data necessary to answer all questions for the Survey of Sexual Violence requested annually from the Department of Justice for the set of definitions. All data collected shall be securely retained.</i></p> <p>2. <i>Each facility shall document the number of allegations, completed investigations, and investigative outcomes in a monthly report. The report shall be submitted to the PREA Coordinator along with the facilities tracking spreadsheet.</i></p> <p>3. <i>All data from available incident-based documents related to allegations of Sexual Abuse shall be collected, reviewed, and maintained as needed.</i></p> <p>4. <i>Data shall be obtained from each private facility which contracts for the confinement of DOC Offenders.</i></p> <p>5. <i>Aggregated data collected shall be made available to the public annually through the DOC website.</i></p> <p>6. <i>All case records associated with claims of sexual offenses, including incident</i></p>

reports, investigation reports, Offender information, case disposition, and medical and counseling evaluation findings and recommendations for post-release treatment or counseling, shall be retained in accordance with the records retention schedule.”

This auditor reviewed “ARDOC’s Secretarial Directive (2024-02: Subject: PREA) and concludes that they have the necessary language to align with PREA Standard 115.89.

While onsite at ARDOC’s Headquarters, this auditor interviewed ARDOC’s PREA Coordinator (PC). She shared the process for collecting and aggregating monthly data on sexual abuse/sexual harassments incidents and investigations. She also shared that she receives sexual abuse incident/investigation information from each ARDOC facility’s PREA Compliance Manager/Superintendent, develop monthly and annual reports, then submit ARDOC’s Secretary of Corrections for review/approval. This PREA auditor also interviewed ARDOC’s IT/Social Media Manager, who is the gatekeeper of electronic information being disseminated to the public via ARDOC’s website (after approval from ARDOC’s Secretary of Corrections (agency head) and PREA Coordinator’s submittal).

Additionally, ARDOC’s IT/Social Media Manager walked this auditor through the process once she receives PREA Annual Reports to the reports “going live” onto ARDOC’s website for public viewing. Finally, ARDOC’s PC and IT/Social Media Manager shared that Personal Identifiers are not written into annual reports or redacted prior to “going live” for public viewing. Finally, this auditor reviewed annual reports on ARDOC’s website from 2015 through 2024. Each report contained corrective actions taken. ARDOC’s IT/Social Media Manager shared that ARDOC PREA-related documents are still available for up to 10 years.

This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.89.

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Barbara Ester Unit (BEU) understands PREA Standard 115.401, which states, <i>“During the three-year period starting on August 20, 2013, and during each three-year period thereafter, the agency shall ensure that each facility operated by the agency, or by a private organization on behalf of the agency, is audited at least once.”</i> This auditor interviewed ARDOC's Secretary of Corrections (agency head), who shared that she and the Arkansas Governor support and are committed to their facilities receiving PREA Audits during this 3rd year of this 4th Cycle. Barbara Ester Unit plans to continue to have a PREA audit conducted every three years. This is BEU’s first PREA Facility Audit in the third year of this current audit cycle. This auditor had access to, and the ability to observe, all areas of Barbara Ester Unit This

	<p>auditor was permitted to request and receive copies of any relevant documents. The auditor was permitted to conduct private interviews with facility staff whose roles held responsibility for specific PREA Standards. BEU inmates were permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel.</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.401.</p>
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115.403	Audit contents and findings
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>This PREA Auditor reviewed Barbara Ester Unit (BEU), pre-audit evidentiary documents uploaded via PREA’s Online Audit System (OAS), documents submitted through other electronic sources, conducted on-site interviews, as well as on-site document/file reviews and observations to determine compliance for Standard 115.403.</p> <p>ARDOC has not had any PREA Final Audit Reports issued in the past three years. However, this auditor interviewed ARDOC’s PREA Coordinator (PC). She shared the process for collecting and aggregating monthly data on sexual abuse/sexual harassment incidents and investigations. She also shared that she receives sexual abuse incident/investigation information from each ARDOC facility’s PREA Compliance Manager/Administrator, develops monthly and annual reports, then submits them to ARDOC’s Secretary of Corrections for review/approval. This PREA auditor also interviewed ARDOC’s IT/Social Media Manager, who is the designated gatekeeper of electronic information being disseminated to the public via ARDOC’s website (after approval from ARDOC’s Secretary of Corrections (agency head) and PREA Coordinator’s submittal). Additionally, ARDOC’s IT/Social Media Manager walked this auditor through the process once she receives PREA Annual Reports to the reports “going live” onto ARDOC’s website for public viewing.</p> <p>Finally, ARDOC’s PC and IT/Social Media Manager shared that Personal Identifiers are not written into annual reports or would be redacted prior to “going live” for public viewing. Finally, this auditor reviewed annual reports on ARDOC’s website from 2015 through 2024. Each report contained corrective actions taken. BEU will be conducting their first facility audit in this 3rd year of this 4th cycle. Finally, ARDOC’s IT/Social Media Manager shared that ARDOC PREA-related documents are still available for up to 10 years.</p> <p>This PREA auditor concludes that Barbara Ester Unit (BEU) is in compliance with PREA Standard 115.403.</p>

Appendix: Provision Findings		
115.11 (a)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
115.11 (b)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
115.11 (c)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	yes
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes
115.12 (a)	Contracting with other entities for the confinement of inmates	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	yes
115.12 (b)	Contracting with other entities for the confinement of inmates	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure	yes

	that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	
115.13 (a)	Supervision and monitoring	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into	yes

	consideration: Any applicable State or local laws, regulations, or standards?	
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
115.13 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	yes
115.13 (c)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
115.13 (d)	Supervision and monitoring	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

115.14 (a)	Youthful inmates	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (b)	Youthful inmates	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (c)	Youthful inmates	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.15 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.15 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	na
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the	na

	facility does not have female inmates.)	
115.15 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	na
115.15 (d)	Limits to cross-gender viewing and searches	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
115.15 (f)	Limits to cross-gender viewing and searches	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

115.16 (a)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing?	yes
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication	yes

	with inmates with disabilities including inmates who: Have intellectual disabilities?	
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	no
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
115.16 (b)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
115.16 (c)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes
115.17 (a)	Hiring and promotion decisions	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who	yes

	may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.17 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
115.17 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.17 (d)	Hiring and promotion decisions	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes

115.17 (e)	Hiring and promotion decisions	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
115.17 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.17 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.17 (h)	Hiring and promotion decisions	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.18 (a)	Upgrades to facilities and technologies	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.18 (b)	Upgrades to facilities and technologies	

	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
115.21 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes

	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.21 (d)	Evidence protocol and forensic medical examinations	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.21 (e)	Evidence protocol and forensic medical examinations	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.21 (f)	Evidence protocol and forensic medical examinations	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes
115.21 (h)	Evidence protocol and forensic medical examinations	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	yes
115.22 (a)	Policies to ensure referrals of allegations for investigations	

	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
115.22 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes
115.31 (a)	Employee training	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes

	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.31 (b)	Employee training	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
115.31 (c)	Employee training	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	Volunteer and contractor training	

	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
115.32 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.33 (a)	Inmate education	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
115.33 (b)	Inmate education	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.33 (c)	Inmate education	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes

	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes
115.33 (d)	Inmate education	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes
115.33 (e)	Inmate education	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes
115.33 (f)	Inmate education	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes
115.34 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (b)	Specialized training: Investigations	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and	yes

	Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (c)	Specialized training: Investigations	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.35 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or	yes

	suspicious of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	
115.35 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
115.35 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective	yes

	screening instrument?	
115.41 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10)	yes

	Whether the inmate is detained solely for civil immigration purposes?	
115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
115.41 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes
115.41 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
115.41 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
115.41 (i)	Screening for risk of victimization and abusiveness	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive	yes

	information is not exploited to the inmate's detriment by staff or other inmates?	
115.42 (a) Use of screening information		
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
115.42 (b) Use of screening information		
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
115.42 (c) Use of screening information		
	When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would	yes

	present management or security problems?	
115.42 (d)	Use of screening information	
	Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate?	yes
115.42 (e)	Use of screening information	
	Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
115.42 (f)	Use of screening information	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes
115.42 (g)	Use of screening information	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: transgender inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing	yes

	solely for the placement of LGBT or I inmates pursuant to a consent degree, legal settlement, or legal judgement.)	
115.43 (a)	Protective Custody	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes
115.43 (b)	Protective Custody	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
115.43 (c)	Protective Custody	

	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
115.43 (d) Protective Custody		
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes
115.43 (e) Protective Custody		
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.51 (a) Inmate reporting		
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
115.51 (b) Inmate reporting		
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain	yes

	anonymous upon request?	
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	yes
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from	yes

	this standard.)	
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes
115.52 (f)	Exhaustion of administrative remedies	

	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers,	yes

	including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	Inmate access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual	yes

	abuse or sexual harassment or retaliation?	
115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.61 (c)	Staff and agency reporting duties	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.61 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	Staff and agency reporting duties	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
115.62 (a)	Agency protection duties	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes

115.63 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.63 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.64 (a)	Staff first responder duties	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.64 (b)	Staff first responder duties	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.65 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in	yes

	response to an incident of sexual abuse?	
115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of	yes

	sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
115.67 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.68 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
115.71 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations	yes

	of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
115.71 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
115.71 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.71 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.71 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.71 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes

	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.71 (g)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.71 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.71 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.71 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
115.71 (l)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.72 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.73 (a)	Reporting to inmates	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes

115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
115.73 (c)	Reporting to inmates	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually	yes

	abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	
115.73 (e)	Reporting to inmates	
	Does the agency document all such notifications or attempted notifications?	yes
115.76 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.76 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
115.76 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.76 (d)	Disciplinary sanctions for staff	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
115.77 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes

	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.77 (b)	Corrective action for contractors and volunteers	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
115.78 (a)	Disciplinary sanctions for inmates	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.78 (b)	Disciplinary sanctions for inmates	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
115.78 (c)	Disciplinary sanctions for inmates	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
115.78 (d)	Disciplinary sanctions for inmates	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
115.78 (e)	Disciplinary sanctions for inmates	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.78 (f)	Disciplinary sanctions for inmates	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish	yes

	evidence sufficient to substantiate the allegation?	
115.78 (g)	Disciplinary sanctions for inmates	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
115.81 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
115.81 (b)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
115.81 (c)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
115.81 (d)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior	yes

	sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	
115.82 (a)	Access to emergency medical and mental health services	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.82 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
115.82 (c)	Access to emergency medical and mental health services	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.82 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.83 (c)	Ongoing medical and mental health care for sexual abuse	

	victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	na
115.83 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	na
115.83 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes

115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.86 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

115.87 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.87 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	yes
115.87 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	na
115.88 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant	yes

	to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	
115.88 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.88 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.88 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.89 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
115.89 (b)	Data storage, publication, and destruction	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.89 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.89 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	Frequency and scope of audits	

	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	no
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	yes
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403	Audit contents and findings	

(f)		
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	na